

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CONSERVATION LAW FOUNDATION,
INC.,

Plaintiff,

v.

CHELSEA SANDWICH LLC and
GLOBAL COMPANIES LLC,

Defendants.

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)
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)

CIVIL ACTION NO. 1:24-CV-11766-RGS

THIRD DECLARATION OF THOMAS HENDERSON

I, Thomas Henderson, declare as follows:

Background

1. I am making this declaration to further supplement my May 28, 2025 and June 20, 2025 declarations in this matter.

2. I make this Declaration based upon my personal knowledge and review of records kept in the ordinary course of Roux's business.

The Newterra System at the Chelsea Facility

3. As of June 16, 2025, the eight-week outfall testing regimen required by the Environmental Protection Agency's August 2024 Administrative Order on Consent ("Order") was completed. As a result, effluent testing at the Chelsea Facility returned to being conducted per the NPDES permit's requirements, typically monthly for most parameters.

4. The July monthly effluent sampling after treatment through the Newterra System occurred on July 2, 2025. All effluent parameters covered under the Chelsea Permit and the Order were measured as non-detect or under permit limits. A true and correct copy of the July

10, 2025 Analytical Report prepared for Roux documenting these successful results is attached as **Exhibit Q**.

5. The August monthly effluent sampling occurred on August 4, 2025. In that sample all effluent parameters covered under the Chelsea Permit and the Order were measured as non-detect or under permit limits. A true and correct copy of the August 7, 2025 Analytical Report prepared for Roux documenting these successful results is attached as **Exhibit R**.

6. **Exhibit S** is a summary chart prepared by Roux showing the consolidated effluent sampling results from the samples taken between April 22 and August 4, 2025, which includes pretreatment and post-treatment results. As shown in the summary chart and underlying reports, all contaminants were below permit limits or were non-detect, and the Newterra System successfully reduced several contaminants to below permit limits as shown by comparing the pre- and post-treatment results.

7. Chelsea Sandwich submitted a revised Stormwater Pollution Prevention Plan (“SWPPP”) to EPA and MassDEP on June 30, 2025, to reflect the installation of the Newterra System, as required by Paragraph IV.4 of the Order. A true and correct copy of the email submitting the SWPPP (without attachment due to size) is attached as **Exhibit T**.

[Remainder of Page Intentionally Blank]

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: August 22, 2025

A handwritten signature in blue ink, appearing to read 'Thomas Henderson', is written over a horizontal line.

Thomas Henderson

7396115

EXHIBIT Q

ANALYTICAL REPORT

PREPARED FOR

Attn: Tom Henderson
Roux Associates Inc
200 Summit Drive
Suite 500
Burlington, Massachusetts 01803

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JOB DESCRIPTION

Chelsea Sandwich, LLC - Chelsea, MA

JOB NUMBER

620-27304-1

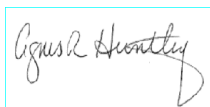
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Job Notes

This report may not be reproduced except in full, and with written approval from the laboratory. The results relate only to the samples tested. For questions please contact the Project Manager at the e-mail address or telephone number listed on this page.

The test results in this report relate only to the samples as received by the laboratory and will meet all requirements of the methodology, with any exceptions noted. This report shall not be reproduced except in full, without the express written approval of the laboratory. All questions should be directed to the Eurofins Environment Testing Northeast, LLC Project Manager.

Authorization



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Authorized for release by
Agnes Huntley, Project Manager
Agnes.Huntley@et.eurofinsus.com
(401)267-4374

Client: Roux Associates Inc
Project/Site: Chelsea Sandwich, LLC - Chelsea, MA

Laboratory Job ID: 620-27304-1

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Definitions/Glossary

Client: Roux Associates Inc
 Project/Site: Chelsea Sandwich, LLC - Chelsea, MA

Job ID: 620-27304-1

Qualifiers**General Chemistry**

Qualifier	Qualifier Description
*-	LCS and/or LCSD is outside acceptance limits, low biased.

Glossary

Abbreviation	These commonly used abbreviations may or may not be present in this report.
☼	Listed under the "D" column to designate that the result is reported on a dry weight basis
%R	Percent Recovery
CFL	Contains Free Liquid
CFU	Colony Forming Unit
CNF	Contains No Free Liquid
DER	Duplicate Error Ratio (normalized absolute difference)
Dil Fac	Dilution Factor
DL	Detection Limit (DoD/DOE)
DL, RA, RE, IN	Indicates a Dilution, Re-analysis, Re-extraction, or additional Initial metals/anion analysis of the sample
DLC	Decision Level Concentration (Radiochemistry)
EDL	Estimated Detection Limit (Dioxin)
LOD	Limit of Detection (DoD/DOE)
LOQ	Limit of Quantitation (DoD/DOE)
MCL	EPA recommended "Maximum Contaminant Level"
MDA	Minimum Detectable Activity (Radiochemistry)
MDC	Minimum Detectable Concentration (Radiochemistry)
MDL	Method Detection Limit
ML	Minimum Level (Dioxin)
MPN	Most Probable Number
MQL	Method Quantitation Limit
NC	Not Calculated
ND	Not Detected at the reporting limit (or MDL or EDL if shown)
NEG	Negative / Absent
POS	Positive / Present
PQL	Practical Quantitation Limit
PRES	Presumptive
QC	Quality Control
RER	Relative Error Ratio (Radiochemistry)
RL	Reporting Limit or Requested Limit (Radiochemistry)
RPD	Relative Percent Difference, a measure of the relative difference between two points
TEF	Toxicity Equivalent Factor (Dioxin)
TEQ	Toxicity Equivalent Quotient (Dioxin)
TNTC	Too Numerous To Count

Case Narrative

Client: Roux Associates Inc
 Project: Chelsea Sandwich, LLC - Chelsea, MA

Job ID: 620-27304-1

Job ID: 620-27304-1**Eurofins Rhode Island**

Job Narrative
620-27304-1

Analytical test results meet all requirements of the associated regulatory program listed on the Accreditation/Certification Summary Page unless otherwise noted under the individual analysis. Data qualifiers and/or narrative comments are included to explain any exceptions, if applicable.

- Matrix QC may not be reported if insufficient sample is provided or site-specific QC samples were not submitted. In these situations, to demonstrate precision and accuracy at a batch level, a LCS/LCSD may be performed, unless otherwise specified in the method.
- Surrogate and/or isotope dilution analyte recoveries (if applicable) which are outside of the QC window are confirmed unless attributed to a dilution or otherwise noted in the narrative.

Regulated compliance samples (e.g. SDWA, NPDES) must comply with the associated agency requirements/permits.

Receipt

The samples were received on 7/2/2025 4:30 PM. Unless otherwise noted below, the samples arrived in good condition, and, where required, properly preserved and on ice. The temperature of the cooler at receipt time was 0.6°C.

GC/MS VOA

No additional analytical or quality issues were noted, other than those described above or in the Definitions/ Glossary page.

GC/MS Semi VOA

No additional analytical or quality issues were noted, other than those described above or in the Definitions/ Glossary page.

Metals

No additional analytical or quality issues were noted, other than those described above or in the Definitions/ Glossary page.

General Chemistry

Method 1664B: The laboratory control sample duplicate (LCSD) associated with preparation batch 620-50184 and analytical batch 620-50210 was outside acceptance criteria. The batch laboratory control sample (LCS) was within acceptance limits and may be used to evaluate matrix performance.

No additional analytical or quality issues were noted, other than those described above or in the Definitions/ Glossary page.

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Detection Summary

Client: Roux Associates Inc
 Project/Site: Chelsea Sandwich, LLC - Chelsea, MA

Job ID: 620-27304-1

Client Sample ID: CS-001**Lab Sample ID: 620-27304-1**

Analyte	Result	Qualifier	RL	Unit	Dil Fac	D	Method	Prep Type
Zinc	22.4		16.0	ug/L	1		200.8	Total/NA
Turbidity	0.40		0.30	NTU	1		180.1	Total/NA
Ammonia as N	0.184		0.100	mg/L	1		EPA 350.1	Total/NA

Client Sample ID: Aquip-INF**Lab Sample ID: 620-27304-2**

Analyte	Result	Qualifier	RL	Unit	Dil Fac	D	Method	Prep Type
Copper	13.3		4.00	ug/L	1		200.8	Total/NA
Zinc	34.8		16.0	ug/L	1		200.8	Total/NA
Ammonia as N	1.02		0.100	mg/L	1		EPA 350.1	Total/NA
Total Suspended Solids	15.0		10.0	mg/L	1		SM 2540D	Total/NA

This Detection Summary does not include radiochemical test results.

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Client Sample Results

Client: Roux Associates Inc
Project/Site: Chelsea Sandwich, LLC - Chelsea, MA

Job ID: 620-27304-1

Client Sample ID: CS-001

Lab Sample ID: 620-27304-1

Date Collected: 07/02/25 09:00

Matrix: Water

Date Received: 07/02/25 16:30

Method: EPA 624.1 - Volatile Organic Compounds (GC/MS)

Analyte	Result	Qualifier	RL	Unit	D	Prepared	Analyzed	Dil Fac
Benzene	ND		1.00	ug/L			07/03/25 17:33	1
Surrogate	%Recovery	Qualifier	Limits			Prepared	Analyzed	Dil Fac
4-Bromofluorobenzene (Surr)	101		70 - 130				07/03/25 17:33	1
Toluene-d8 (Surr)	98		70 - 130				07/03/25 17:33	1
1,2-Dichloroethane-d4 (Surr)	102		70 - 130				07/03/25 17:33	1
Dibromofluoromethane (Surr)	106		70 - 130				07/03/25 17:33	1

Method: EPA 625.1 SIM - Semivolatile Organic Compounds GC/MS (SIM)

Analyte	Result	Qualifier	RL	Unit	D	Prepared	Analyzed	Dil Fac
Benzo[a]anthracene	ND		0.0463	ug/L		07/03/25 17:08	07/09/25 01:14	1
Benzo[a]pyrene	ND		0.0463	ug/L		07/03/25 17:08	07/09/25 01:14	1
Benzo[b]fluoranthene	ND		0.0463	ug/L		07/03/25 17:08	07/09/25 01:14	1
Benzo[k]fluoranthene	ND		0.0463	ug/L		07/03/25 17:08	07/09/25 01:14	1
Chrysene	ND		0.0463	ug/L		07/03/25 17:08	07/09/25 01:14	1
Dibenz(a,h)anthracene	ND		0.0463	ug/L		07/03/25 17:08	07/09/25 01:14	1
Indeno[1,2,3-cd]pyrene	ND		0.0463	ug/L		07/03/25 17:08	07/09/25 01:14	1
Naphthalene	ND		0.0463	ug/L		07/03/25 17:08	07/09/25 01:14	1
Surrogate	%Recovery	Qualifier	Limits			Prepared	Analyzed	Dil Fac
2-Fluorobiphenyl (Surr)	42		30 - 130			07/03/25 17:08	07/09/25 01:14	1
Terphenyl-d14	41		30 - 130			07/03/25 17:08	07/09/25 01:14	1
Benzo(e)pyrene-d12	62		30 - 130			07/03/25 17:08	07/09/25 01:14	1

Method: EPA 200.8 - Metals (ICP/MS)

Analyte	Result	Qualifier	RL	Unit	D	Prepared	Analyzed	Dil Fac
Copper	ND		4.00	ug/L		07/02/25 18:05	07/08/25 12:37	1
Zinc	22.4		16.0	ug/L		07/02/25 18:05	07/08/25 12:37	1

General Chemistry

Analyte	Result	Qualifier	RL	Unit	D	Prepared	Analyzed	Dil Fac
Oil & Grease (1664B)	ND	*-	1.9	mg/L		07/08/25 10:45	07/08/25 16:17	1
Turbidity (EPA 180.1)	0.40		0.30	NTU			07/03/25 13:02	1
Chemical Oxygen Demand (EPA 410.4)	ND		10.0	mg/L		07/10/25 09:31	07/10/25 16:08	1
Ammonia as N (EPA 350.1)	0.184		0.100	mg/L			07/07/25 14:16	1
Total Suspended Solids (SM 2540D)	ND		5.00	mg/L			07/03/25 16:20	1

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Client Sample Results

Client: Roux Associates Inc
Project/Site: Chelsea Sandwich, LLC - Chelsea, MA

Job ID: 620-27304-1

Client Sample ID: Aquip-INF

Lab Sample ID: 620-27304-2

Date Collected: 07/02/25 09:10

Matrix: Water

Date Received: 07/02/25 16:30

Method: EPA 624.1 - Volatile Organic Compounds (GC/MS)

Analyte	Result	Qualifier	RL	Unit	D	Prepared	Analyzed	Dil Fac
Benzene	ND		1.00	ug/L			07/03/25 17:56	1
Surrogate	%Recovery	Qualifier	Limits			Prepared	Analyzed	Dil Fac
4-Bromofluorobenzene (Surr)	100		70 - 130				07/03/25 17:56	1
Toluene-d8 (Surr)	98		70 - 130				07/03/25 17:56	1
1,2-Dichloroethane-d4 (Surr)	105		70 - 130				07/03/25 17:56	1
Dibromofluoromethane (Surr)	110		70 - 130				07/03/25 17:56	1

Method: EPA 625.1 SIM - Semivolatile Organic Compounds GC/MS (SIM)

Analyte	Result	Qualifier	RL	Unit	D	Prepared	Analyzed	Dil Fac
Benzo[a]anthracene	ND		0.0463	ug/L		07/03/25 17:08	07/09/25 01:43	1
Benzo[a]pyrene	ND		0.0463	ug/L		07/03/25 17:08	07/09/25 01:43	1
Benzo[b]fluoranthene	ND		0.0463	ug/L		07/03/25 17:08	07/09/25 01:43	1
Benzo[k]fluoranthene	ND		0.0463	ug/L		07/03/25 17:08	07/09/25 01:43	1
Chrysene	ND		0.0463	ug/L		07/03/25 17:08	07/09/25 01:43	1
Dibenz(a,h)anthracene	ND		0.0463	ug/L		07/03/25 17:08	07/09/25 01:43	1
Indeno[1,2,3-cd]pyrene	ND		0.0463	ug/L		07/03/25 17:08	07/09/25 01:43	1
Naphthalene	ND		0.0463	ug/L		07/03/25 17:08	07/09/25 01:43	1
Surrogate	%Recovery	Qualifier	Limits			Prepared	Analyzed	Dil Fac
2-Fluorobiphenyl (Surr)	48		30 - 130			07/03/25 17:08	07/09/25 01:43	1
Terphenyl-d14	58		30 - 130			07/03/25 17:08	07/09/25 01:43	1
Benzo(e)pyrene-d12	88		30 - 130			07/03/25 17:08	07/09/25 01:43	1

Method: EPA 200.8 - Metals (ICP/MS)

Analyte	Result	Qualifier	RL	Unit	D	Prepared	Analyzed	Dil Fac
Copper	13.3		4.00	ug/L		07/02/25 18:05	07/08/25 12:45	1
Zinc	34.8		16.0	ug/L		07/02/25 18:05	07/08/25 12:45	1

General Chemistry

Analyte	Result	Qualifier	RL	Unit	D	Prepared	Analyzed	Dil Fac
Ammonia as N (EPA 350.1)	1.02		0.100	mg/L			07/07/25 14:18	1
Total Suspended Solids (SM 2540D)	15.0		10.0	mg/L			07/03/25 16:20	1

Surrogate Summary

Client: Roux Associates Inc
 Project/Site: Chelsea Sandwich, LLC - Chelsea, MA

Job ID: 620-27304-1

Method: 624.1 - Volatile Organic Compounds (GC/MS)**Matrix: Water****Prep Type: Total/NA**

Lab Sample ID	Client Sample ID	Percent Surrogate Recovery (Acceptance Limits)			
		BFB (70-130)	TOL (70-130)	DCA (70-130)	DBFM (70-130)
620-27304-1	CS-001	101	98	102	106
620-27304-2	Aquip-INF	100	98	105	110
LCS 620-50028/4	Lab Control Sample	102	100	108	109
LCSD 620-50028/5	Lab Control Sample Dup	103	100	107	108
MB 620-50028/7	Method Blank	99	94	111	109

Surrogate Legend

BFB = 4-Bromofluorobenzene (Surr)

TOL = Toluene-d8 (Surr)

DCA = 1,2-Dichloroethane-d4 (Surr)

DBFM = Dibromofluoromethane (Surr)

Method: 625.1 SIM - Semivolatile Organic Compounds GC/MS (SIM)**Matrix: Water****Prep Type: Total/NA**

Lab Sample ID	Client Sample ID	Percent Surrogate Recovery (Acceptance Limits)		
		FBP (30-130)	TPHL (30-130)	BePd12 (30-130)
620-27304-1	CS-001	42	41	62
620-27304-2	Aquip-INF	48	58	88
LCS 620-50071/4-A	Lab Control Sample	50	59	82
LCSD 620-50071/5-A	Lab Control Sample Dup	50	69	95
MB 620-50071/1-A	Method Blank	47	59	88

Surrogate Legend

FBP = 2-Fluorobiphenyl (Surr)

TPHL = Terphenyl-d14

BePd12 = Benzo(e)pyrene-d12

QC Sample Results

Client: Roux Associates Inc
Project/Site: Chelsea Sandwich, LLC - Chelsea, MA

Job ID: 620-27304-1

Method: 624.1 - Volatile Organic Compounds (GC/MS)

Lab Sample ID: MB 620-50028/7

Matrix: Water

Analysis Batch: 50028

Client Sample ID: Method Blank

Prep Type: Total/NA

Analyte	MB Result	MB Qualifier	RL	Unit	D	Prepared	Analyzed	Dil Fac
Benzene	ND		1.00	ug/L			07/03/25 11:29	1
Surrogate	%Recovery	MB Qualifier	Limits			Prepared	Analyzed	Dil Fac
4-Bromofluorobenzene (Surr)	99		70 - 130				07/03/25 11:29	1
Toluene-d8 (Surr)	94		70 - 130				07/03/25 11:29	1
1,2-Dichloroethane-d4 (Surr)	111		70 - 130				07/03/25 11:29	1
Dibromofluoromethane (Surr)	109		70 - 130				07/03/25 11:29	1

Lab Sample ID: LCS 620-50028/4

Matrix: Water

Analysis Batch: 50028

Client Sample ID: Lab Control Sample

Prep Type: Total/NA

Analyte	Spike Added	LCS Result	LCS Qualifier	Unit	D	%Rec	%Rec Limits
Benzene	20.0	17.90		ug/L		90	65 - 135
Surrogate	%Recovery	LCS Qualifier	Limits				
4-Bromofluorobenzene (Surr)	102		70 - 130				
Toluene-d8 (Surr)	100		70 - 130				
1,2-Dichloroethane-d4 (Surr)	108		70 - 130				
Dibromofluoromethane (Surr)	109		70 - 130				

Lab Sample ID: LCSD 620-50028/5

Matrix: Water

Analysis Batch: 50028

Client Sample ID: Lab Control Sample Dup

Prep Type: Total/NA

Analyte	Spike Added	LCSD Result	LCSD Qualifier	Unit	D	%Rec	%Rec Limits	RPD	RPD Limit
Benzene	20.0	18.03		ug/L		90	65 - 135	1	
Surrogate	%Recovery	LCSD Qualifier	Limits						
4-Bromofluorobenzene (Surr)	103		70 - 130						
Toluene-d8 (Surr)	100		70 - 130						
1,2-Dichloroethane-d4 (Surr)	107		70 - 130						
Dibromofluoromethane (Surr)	108		70 - 130						

Method: 625.1 SIM - Semivolatile Organic Compounds GC/MS (SIM)

Lab Sample ID: MB 620-50071/1-A

Matrix: Water

Analysis Batch: 50125

Client Sample ID: Method Blank

Prep Type: Total/NA

Prep Batch: 50071

Analyte	MB Result	MB Qualifier	RL	Unit	D	Prepared	Analyzed	Dil Fac
Benzo[a]anthracene	ND		0.0500	ug/L		07/03/25 17:08	07/07/25 16:35	1
Benzo[a]pyrene	ND		0.0500	ug/L		07/03/25 17:08	07/07/25 16:35	1
Benzo[b]fluoranthene	ND		0.0500	ug/L		07/03/25 17:08	07/07/25 16:35	1
Benzo[k]fluoranthene	ND		0.0500	ug/L		07/03/25 17:08	07/07/25 16:35	1
Chrysene	ND		0.0500	ug/L		07/03/25 17:08	07/07/25 16:35	1
Dibenz(a,h)anthracene	ND		0.0500	ug/L		07/03/25 17:08	07/07/25 16:35	1
Indeno[1,2,3-cd]pyrene	ND		0.0500	ug/L		07/03/25 17:08	07/07/25 16:35	1

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QC Sample Results

Client: Roux Associates Inc
Project/Site: Chelsea Sandwich, LLC - Chelsea, MA

Job ID: 620-27304-1

Method: 625.1 SIM - Semivolatile Organic Compounds GC/MS (SIM) (Continued)

Lab Sample ID: MB 620-50071/1-A

Matrix: Water

Analysis Batch: 50125

Client Sample ID: Method Blank

Prep Type: Total/NA

Prep Batch: 50071

Analyte	MB Result	MB Qualifier	RL	Unit	D	Prepared	Analyzed	Dil Fac
Naphthalene	ND		0.0500	ug/L		07/03/25 17:08	07/07/25 16:35	1
Surrogate	%Recovery	MB Qualifier	Limits			Prepared	Analyzed	Dil Fac
2-Fluorobiphenyl (Surr)	47		30 - 130			07/03/25 17:08	07/07/25 16:35	1
Terphenyl-d14	59		30 - 130			07/03/25 17:08	07/07/25 16:35	1
Benzo(e)pyrene-d12	88		30 - 130			07/03/25 17:08	07/07/25 16:35	1

Lab Sample ID: LCS 620-50071/4-A

Matrix: Water

Analysis Batch: 50125

Client Sample ID: Lab Control Sample

Prep Type: Total/NA

Prep Batch: 50071

Analyte	Spike Added	LCS Result	LCS Qualifier	Unit	D	%Rec	%Rec Limits
Benzo[a]anthracene	4.00	3.651		ug/L		91	33 - 143
Benzo[a]pyrene	4.00	3.664		ug/L		92	17 - 163
Benzo[b]fluoranthene	4.00	3.105		ug/L		78	24 - 159
Benzo[k]fluoranthene	4.00	3.358		ug/L		84	11 - 162
Chrysene	4.00	2.868		ug/L		72	17 - 168
Dibenz(a,h)anthracene	4.00	3.441		ug/L		86	10 - 227
Indeno[1,2,3-cd]pyrene	4.00	3.344		ug/L		84	10 - 171
Naphthalene	4.00	2.843		ug/L		71	21 - 133
Surrogate	%Recovery	LCS Qualifier	Limits				
2-Fluorobiphenyl (Surr)	50		30 - 130				
Terphenyl-d14	59		30 - 130				
Benzo(e)pyrene-d12	82		30 - 130				

Lab Sample ID: LCSD 620-50071/5-A

Matrix: Water

Analysis Batch: 50125

Client Sample ID: Lab Control Sample Dup

Prep Type: Total/NA

Prep Batch: 50071

Analyte	Spike Added	LCSD Result	LCSD Qualifier	Unit	D	%Rec	%Rec Limits	RPD	RPD Limit
Benzo[a]anthracene	4.00	4.194		ug/L		105	33 - 143	14	53
Benzo[a]pyrene	4.00	4.221		ug/L		106	17 - 163	14	72
Benzo[b]fluoranthene	4.00	3.574		ug/L		89	24 - 159	14	71
Benzo[k]fluoranthene	4.00	3.849		ug/L		96	11 - 162	14	63
Chrysene	4.00	3.274		ug/L		82	17 - 168	13	87
Dibenz(a,h)anthracene	4.00	3.719		ug/L		93	10 - 227	8	126
Indeno[1,2,3-cd]pyrene	4.00	3.673		ug/L		92	10 - 171	9	99
Naphthalene	4.00	2.766		ug/L		69	21 - 133	3	65
Surrogate	%Recovery	LCSD Qualifier	Limits						
2-Fluorobiphenyl (Surr)	50		30 - 130						
Terphenyl-d14	69		30 - 130						
Benzo(e)pyrene-d12	95		30 - 130						

Eurofins Rhode Island

QC Sample Results

Client: Roux Associates Inc
Project/Site: Chelsea Sandwich, LLC - Chelsea, MA

Job ID: 620-27304-1

Method: 200.8 - Metals (ICP/MS)

Lab Sample ID: MB 620-50010/1-A

Matrix: Water

Analysis Batch: 50201

Client Sample ID: Method Blank

Prep Type: Total/NA

Prep Batch: 50010

Analyte	MB Result	MB Qualifier	RL	Unit	D	Prepared	Analyzed	Dil Fac
Copper	ND		4.00	ug/L		07/02/25 18:05	07/08/25 12:32	1
Zinc	ND		16.0	ug/L		07/02/25 18:05	07/08/25 12:32	1

Lab Sample ID: LCS 620-50010/2-A

Matrix: Water

Analysis Batch: 50201

Client Sample ID: Lab Control Sample

Prep Type: Total/NA

Prep Batch: 50010

Analyte	Spike Added	LCS Result	LCS Qualifier	Unit	D	%Rec	%Rec Limits
Copper	50.0	49.76		ug/L		100	85 - 115
Zinc	50.0	43.31		ug/L		87	85 - 115

Lab Sample ID: 620-27304-1 MS

Matrix: Water

Analysis Batch: 50201

Client Sample ID: CS-001

Prep Type: Total/NA

Prep Batch: 50010

Analyte	Sample Result	Sample Qualifier	Spike Added	MS Result	MS Qualifier	Unit	D	%Rec	%Rec Limits
Copper	ND		50.0	49.72		ug/L		99	70 - 130
Zinc	22.4		50.0	83.05		ug/L		121	70 - 130

Lab Sample ID: 620-27304-1 DU

Matrix: Water

Analysis Batch: 50201

Client Sample ID: CS-001

Prep Type: Total/NA

Prep Batch: 50010

Analyte	Sample Result	Sample Qualifier	DU Result	DU Qualifier	Unit	D	RPD	RPD Limit
Copper	ND		ND		ug/L		NC	20
Zinc	22.4		25.21		ug/L		12	20

Method: 1664B - HEM and SGT-HEM

Lab Sample ID: MB 620-50184/1-A

Matrix: Water

Analysis Batch: 50210

Client Sample ID: Method Blank

Prep Type: Total/NA

Prep Batch: 50184

Analyte	MB Result	MB Qualifier	RL	Unit	D	Prepared	Analyzed	Dil Fac
Oil & Grease	ND		2.0	mg/L		07/08/25 10:45	07/08/25 16:17	1

Lab Sample ID: LCS 620-50184/2-A

Matrix: Water

Analysis Batch: 50210

Client Sample ID: Lab Control Sample

Prep Type: Total/NA

Prep Batch: 50184

Analyte	Spike Added	LCS Result	LCS Qualifier	Unit	D	%Rec	%Rec Limits
Oil & Grease	40.0	33.50		mg/L		84	78 - 114

Lab Sample ID: LCSD 620-50184/3-A

Matrix: Water

Analysis Batch: 50210

Client Sample ID: Lab Control Sample Dup

Prep Type: Total/NA

Prep Batch: 50184

Analyte	Spike Added	LCSD Result	LCSD Qualifier	Unit	D	%Rec	%Rec Limits	RPD	RPD Limit
Oil & Grease	40.0	30.70	*-	mg/L		77	78 - 114	9	11

Eurofins Rhode Island

QC Sample Results

Client: Roux Associates Inc
Project/Site: Chelsea Sandwich, LLC - Chelsea, MA

Job ID: 620-27304-1

Method: 180.1 - Turbidity, Nephelometric

Lab Sample ID: MB 620-50085/8

Matrix: Water

Analysis Batch: 50085

Client Sample ID: Method Blank

Prep Type: Total/NA

Analyte	MB Result	MB Qualifier	RL	Unit	D	Prepared	Analyzed	Dil Fac
Turbidity	ND		0.30	NTU			07/03/25 13:02	1

Lab Sample ID: LCS 620-50085/9

Matrix: Water

Analysis Batch: 50085

Client Sample ID: Lab Control Sample

Prep Type: Total/NA

Analyte	Spike Added	LCS Result	LCS Qualifier	Unit	D	%Rec	%Rec Limits
Turbidity	100	100		NTU		99	90 - 110

Lab Sample ID: 620-27304-1 DU

Matrix: Water

Analysis Batch: 50085

Client Sample ID: CS-001

Prep Type: Total/NA

Analyte	Sample Result	Sample Qualifier	DU Result	DU Qualifier	Unit	D	RPD	RPD Limit
Turbidity	0.40		0.40		NTU		6	20

Method: 410.4 - COD

Lab Sample ID: MB 620-50314/3-A

Matrix: Water

Analysis Batch: 50355

Client Sample ID: Method Blank

Prep Type: Total/NA

Prep Batch: 50314

Analyte	MB Result	MB Qualifier	RL	Unit	D	Prepared	Analyzed	Dil Fac
Chemical Oxygen Demand	ND		10.0	mg/L		07/10/25 09:31	07/10/25 16:08	1

Lab Sample ID: LCS 620-50314/4-A

Matrix: Water

Analysis Batch: 50355

Client Sample ID: Lab Control Sample

Prep Type: Total/NA

Prep Batch: 50314

Analyte	Spike Added	LCS Result	LCS Qualifier	Unit	D	%Rec	%Rec Limits
Chemical Oxygen Demand	75.0	74.16		mg/L		99	90 - 110

Method: EPA 350.1 - Nitrogen, Ammonia

Lab Sample ID: MB 410-668186/109

Matrix: Water

Analysis Batch: 668186

Client Sample ID: Method Blank

Prep Type: Total/NA

Analyte	MB Result	MB Qualifier	RL	Unit	D	Prepared	Analyzed	Dil Fac
Ammonia as N	ND		0.100	mg/L			07/07/25 13:30	1

Lab Sample ID: LCS 410-668186/107

Matrix: Water

Analysis Batch: 668186

Client Sample ID: Lab Control Sample

Prep Type: Total/NA

Analyte	Spike Added	LCS Result	LCS Qualifier	Unit	D	%Rec	%Rec Limits
Ammonia as N	2.00	2.150		mg/L		107	90 - 110

Eurofins Rhode Island

QC Sample Results

Client: Roux Associates Inc
 Project/Site: Chelsea Sandwich, LLC - Chelsea, MA

Job ID: 620-27304-1

Method: EPA 350.1 - Nitrogen, Ammonia (Continued)

Lab Sample ID: LCSD 410-668186/108

Matrix: Water

Analysis Batch: 668186

Client Sample ID: Lab Control Sample Dup

Prep Type: Total/NA

Analyte	Spike Added	LCSD Result	LCSD Qualifier	Unit	D	%Rec	%Rec Limits	RPD	RPD Limit
Ammonia as N	2.00	2.055		mg/L		103	90 - 110	5	15

Method: SM 2540D - Solids, Total Suspended (TSS)

Lab Sample ID: MB 620-50070/1

Matrix: Water

Analysis Batch: 50070

Client Sample ID: Method Blank

Prep Type: Total/NA

Analyte	MB Result	MB Qualifier	RL	Unit	D	Prepared	Analyzed	Dil Fac
Total Suspended Solids	ND		5.00	mg/L			07/03/25 16:20	1

Lab Sample ID: LCS 620-50070/2

Matrix: Water

Analysis Batch: 50070

Client Sample ID: Lab Control Sample

Prep Type: Total/NA

Analyte	Spike Added	LCS Result	LCS Qualifier	Unit	D	%Rec	%Rec Limits		
Total Suspended Solids	100	84.00		mg/L		84	77 - 110		

QC Association Summary

Client: Roux Associates Inc
 Project/Site: Chelsea Sandwich, LLC - Chelsea, MA

Job ID: 620-27304-1

GC/MS VOA**Analysis Batch: 50028**

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
620-27304-1	CS-001	Total/NA	Water	624.1	
620-27304-2	Aquip-INF	Total/NA	Water	624.1	
MB 620-50028/7	Method Blank	Total/NA	Water	624.1	
LCS 620-50028/4	Lab Control Sample	Total/NA	Water	624.1	
LCSD 620-50028/5	Lab Control Sample Dup	Total/NA	Water	624.1	

GC/MS Semi VOA**Prep Batch: 50071**

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
620-27304-1	CS-001	Total/NA	Water	625	
620-27304-2	Aquip-INF	Total/NA	Water	625	
MB 620-50071/1-A	Method Blank	Total/NA	Water	625	
LCS 620-50071/4-A	Lab Control Sample	Total/NA	Water	625	
LCSD 620-50071/5-A	Lab Control Sample Dup	Total/NA	Water	625	

Analysis Batch: 50125

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
MB 620-50071/1-A	Method Blank	Total/NA	Water	625.1 SIM	50071
LCS 620-50071/4-A	Lab Control Sample	Total/NA	Water	625.1 SIM	50071
LCSD 620-50071/5-A	Lab Control Sample Dup	Total/NA	Water	625.1 SIM	50071

Analysis Batch: 50193

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
620-27304-1	CS-001	Total/NA	Water	625.1 SIM	50071
620-27304-2	Aquip-INF	Total/NA	Water	625.1 SIM	50071

Metals**Prep Batch: 50010**

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
620-27304-1	CS-001	Total/NA	Water	200.8	
620-27304-2	Aquip-INF	Total/NA	Water	200.8	
MB 620-50010/1-A	Method Blank	Total/NA	Water	200.8	
LCS 620-50010/2-A	Lab Control Sample	Total/NA	Water	200.8	
620-27304-1 MS	CS-001	Total/NA	Water	200.8	
620-27304-1 DU	CS-001	Total/NA	Water	200.8	

Analysis Batch: 50201

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
620-27304-1	CS-001	Total/NA	Water	200.8	50010
620-27304-2	Aquip-INF	Total/NA	Water	200.8	50010
MB 620-50010/1-A	Method Blank	Total/NA	Water	200.8	50010
LCS 620-50010/2-A	Lab Control Sample	Total/NA	Water	200.8	50010
620-27304-1 MS	CS-001	Total/NA	Water	200.8	50010
620-27304-1 DU	CS-001	Total/NA	Water	200.8	50010

General Chemistry**Analysis Batch: 50070**

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
620-27304-1	CS-001	Total/NA	Water	SM 2540D	

Eurofins Rhode Island

QC Association Summary

Client: Roux Associates Inc
 Project/Site: Chelsea Sandwich, LLC - Chelsea, MA

Job ID: 620-27304-1

General Chemistry (Continued)**Analysis Batch: 50070 (Continued)**

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
620-27304-2	Aquip-INF	Total/NA	Water	SM 2540D	
MB 620-50070/1	Method Blank	Total/NA	Water	SM 2540D	
LCS 620-50070/2	Lab Control Sample	Total/NA	Water	SM 2540D	

Analysis Batch: 50085

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
620-27304-1	CS-001	Total/NA	Water	180.1	
MB 620-50085/8	Method Blank	Total/NA	Water	180.1	
LCS 620-50085/9	Lab Control Sample	Total/NA	Water	180.1	
620-27304-1 DU	CS-001	Total/NA	Water	180.1	

Prep Batch: 50184

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
620-27304-1	CS-001	Total/NA	Water	1664B	
MB 620-50184/1-A	Method Blank	Total/NA	Water	1664B	
LCS 620-50184/2-A	Lab Control Sample	Total/NA	Water	1664B	
LCSD 620-50184/3-A	Lab Control Sample Dup	Total/NA	Water	1664B	

Analysis Batch: 50210

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
620-27304-1	CS-001	Total/NA	Water	1664B	50184
MB 620-50184/1-A	Method Blank	Total/NA	Water	1664B	50184
LCS 620-50184/2-A	Lab Control Sample	Total/NA	Water	1664B	50184
LCSD 620-50184/3-A	Lab Control Sample Dup	Total/NA	Water	1664B	50184

Prep Batch: 50314

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
620-27304-1	CS-001	Total/NA	Water	410.4	
MB 620-50314/3-A	Method Blank	Total/NA	Water	410.4	
LCS 620-50314/4-A	Lab Control Sample	Total/NA	Water	410.4	

Analysis Batch: 50355

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
620-27304-1	CS-001	Total/NA	Water	410.4	50314
MB 620-50314/3-A	Method Blank	Total/NA	Water	410.4	50314
LCS 620-50314/4-A	Lab Control Sample	Total/NA	Water	410.4	50314

Analysis Batch: 668186

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
620-27304-1	CS-001	Total/NA	Water	EPA 350.1	
620-27304-2	Aquip-INF	Total/NA	Water	EPA 350.1	
MB 410-668186/109	Method Blank	Total/NA	Water	EPA 350.1	
LCS 410-668186/107	Lab Control Sample	Total/NA	Water	EPA 350.1	
LCSD 410-668186/108	Lab Control Sample Dup	Total/NA	Water	EPA 350.1	

Eurofins Rhode Island

Lab Chronicle

Client: Roux Associates Inc
 Project/Site: Chelsea Sandwich, LLC - Chelsea, MA

Job ID: 620-27304-1

Client Sample ID: CS-001**Lab Sample ID: 620-27304-1****Date Collected: 07/02/25 09:00****Matrix: Water****Date Received: 07/02/25 16:30**

Prep Type	Batch Type	Batch Method	Run	Dilution Factor	Batch Number	Analyst	Lab	Prepared or Analyzed
Total/NA	Analysis	624.1		1	50028	CLR	EET RI	07/03/25 17:33
Total/NA	Prep	625			50071	AAH	EET RI	07/03/25 17:08
Total/NA	Analysis	625.1 SIM		1	50193	JS	EET RI	07/09/25 01:14
Total/NA	Prep	200.8			50010	JPC	EET RI	07/02/25 18:05
Total/NA	Analysis	200.8		1	50201	JPC	EET RI	07/08/25 12:37
Total/NA	Prep	1664B			50184	BJJ	EET RI	07/08/25 10:45
Total/NA	Analysis	1664B		1	50210	AZD	EET RI	07/08/25 16:17
Total/NA	Analysis	180.1		1	50085	JPC	EET RI	07/03/25 13:02
Total/NA	Prep	410.4			50314	DJW	EET RI	07/10/25 09:31
Total/NA	Analysis	410.4		1	50355	DJW	EET RI	07/10/25 16:08
Total/NA	Analysis	EPA 350.1		1	668186	JCG7	ELLE	07/07/25 14:16
Total/NA	Analysis	SM 2540D		1	50070	DJW	EET RI	07/03/25 16:20

Client Sample ID: Aquip-INF**Lab Sample ID: 620-27304-2****Date Collected: 07/02/25 09:10****Matrix: Water****Date Received: 07/02/25 16:30**

Prep Type	Batch Type	Batch Method	Run	Dilution Factor	Batch Number	Analyst	Lab	Prepared or Analyzed
Total/NA	Analysis	624.1		1	50028	CLR	EET RI	07/03/25 17:56
Total/NA	Prep	625			50071	AAH	EET RI	07/03/25 17:08
Total/NA	Analysis	625.1 SIM		1	50193	JS	EET RI	07/09/25 01:43
Total/NA	Prep	200.8			50010	JPC	EET RI	07/02/25 18:05
Total/NA	Analysis	200.8		1	50201	JPC	EET RI	07/08/25 12:45
Total/NA	Analysis	EPA 350.1		1	668186	JCG7	ELLE	07/07/25 14:18
Total/NA	Analysis	SM 2540D		1	50070	DJW	EET RI	07/03/25 16:20

Laboratory References:

EET RI = Eurofins Rhode Island, 646 Camp Ave, North Kingstown, RI 02852, TEL (413)789-9018

ELLE = Eurofins Lancaster Laboratories Environment Testing, LLC, 2425 New Holland Pike, Lancaster, PA 17601, TEL (717)656-2300

Accreditation/Certification Summary

Client: Roux Associates Inc
Project/Site: Chelsea Sandwich, LLC - Chelsea, MA

Job ID: 620-27304-1

Laboratory: Eurofins Rhode Island

Unless otherwise noted, all analytes for this laboratory were covered under each accreditation/certification below.

Authority	Program	Identification Number	Expiration Date
Massachusetts	State	M-RI907	06-30-26

The following analytes are included in this report, but the laboratory is not certified by the governing authority. This list may include analytes for which the agency does not offer certification.

Analysis Method	Prep Method	Matrix	Analyte
180.1		Water	Turbidity
625.1 SIM	625	Water	Benzo[a]anthracene
625.1 SIM	625	Water	Benzo[a]pyrene
625.1 SIM	625	Water	Benzo[b]fluoranthene
625.1 SIM	625	Water	Benzo[k]fluoranthene
625.1 SIM	625	Water	Chrysene
625.1 SIM	625	Water	Dibenz(a,h)anthracene
625.1 SIM	625	Water	Indeno[1,2,3-cd]pyrene
625.1 SIM	625	Water	Naphthalene

Laboratory: Eurofins Lancaster Laboratories Environment Testing, LLC

The accreditations/certifications listed below are applicable to this report.

Authority	Program	Identification Number	Expiration Date
Massachusetts	State	M-PA009	06-30-26

Method Summary

Client: Roux Associates Inc

Job ID: 620-27304-1

Project/Site: Chelsea Sandwich, LLC - Chelsea, MA

Method	Method Description	Protocol	Laboratory
624.1	Volatile Organic Compounds (GC/MS)	EPA	EET RI
625.1 SIM	Semivolatile Organic Compounds GC/MS (SIM)	EPA	EET RI
200.8	Metals (ICP/MS)	EPA	EET RI
1664B	HEM and SGT-HEM	1664B	EET RI
180.1	Turbidity, Nephelometric	EPA	EET RI
410.4	COD	EPA	EET RI
EPA 350.1	Nitrogen, Ammonia	EPA	ELLE
SM 2540D	Solids, Total Suspended (TSS)	SM	EET RI
1664B	HEM and SGT-HEM (Aqueous)	1664B	EET RI
200.8	Preparation, Total Metals	EPA	EET RI
410.4	COD	EPA	EET RI
625	Liquid-Liquid Extraction	EPA	EET RI

Protocol References:

1664B = EPA-821-98-002

EPA = US Environmental Protection Agency

SM = "Standard Methods For The Examination Of Water And Wastewater"

Laboratory References:

EET RI = Eurofins Rhode Island, 646 Camp Ave, North Kingstown, RI 02852, TEL (413)789-9018

ELLE = Eurofins Lancaster Laboratories Environment Testing, LLC, 2425 New Holland Pike, Lancaster, PA 17601, TEL (717)656-2300

Sample Summary

Client: Roux Associates Inc
Project/Site: Chelsea Sandwich, LLC - Chelsea, MA

Job ID: 620-27304-1

Lab Sample ID	Client Sample ID	Matrix	Collected	Received
620-27304-1	CS-001	Water	07/02/25 09:00	07/02/25 16:30
620-27304-2	Aquip-INF	Water	07/02/25 09:10	07/02/25 16:30

27304



Spectrum Analytical

CHAIN OF CUSTODY RECORD

Page 1 of 1

Special Handling:

- ☒ Standard TAT - 7 to 10 business days
☐ Rush TAT - Date Needed. _____

All TATs subject to laboratory approval
Min. 24-hr notification needed for rushes
Samples disposed after 30 days unless otherwise instructed.

Report To <u>Roux Associates</u> <u>200 Summit Drive, Suite 500</u> <u>Burlington, MA 01803</u> Telephone # <u>(781)-569-4000</u> Project Mgr <u>Tom Henderson</u>		Invoice To <u>Roux</u> e-mail invoice to <u>rouxap@rouxinc.com</u> P O No <u>1629 0009M002</u> Quote # _____		Project No <u>1629 0009M002</u> Site Name <u>Chelsea Sandwich, LLC - Monthly April to October</u> Location <u>11 Broadway, Chelsea</u> State <u>MA</u> Sampler(s) <u>K. GAUDET</u>																
F=Field Filtered 1=Na ₂ S ₂ O ₃ 2=HCl 3=H ₂ SO ₄ 4=HNO ₃ 5=NaOH 6=Ascorbic Acid 7=CH ₃ OH 8=NaHSO ₄ 9=Deionized Water 10=H ₃ PO ₄ 11= _____ 12= _____				List Preservative Code below: - - 3 3 2 - 4 3 - -				QA/QC Reporting Notes: * additional charges may apply MA DEP MCP CAM Report? <input type="checkbox"/> Yes <input type="checkbox"/> No CT DPH RCP Report? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Standard <input type="checkbox"/> No QC <input type="checkbox"/> DQA* <input type="checkbox"/> ASP A* <input type="checkbox"/> ASP B* <input type="checkbox"/> NJ Reduced* <input type="checkbox"/> NJ Full* <input type="checkbox"/> Tier II* <input type="checkbox"/> Tier IV* <input type="checkbox"/> Other _____ State-specific reporting standards												
DW=Drinking Water GW=Groundwater SW=Surface Water WW=Waste Water O=Oil SO=Soil SL=Sludge A=Indoor/Ambient Air SG=Soil Gas X1= _____ X2= _____ X3= _____				Containers				Analysis				Check if chlorinated								
G= Grab C=Composite				Type Matrix																
Lab ID:	Sample ID:	Date:	Time:	Type	Matrix	# of VOA Vials	# of Amber Glass	# of Clear Glass	# of Plastic	TSS (2540D)	Turbidity (180.1)		Chemical Oxygen Demand	Oil & Grease (1664B)	Benzene (624.1)	Target PAHs (625.1 SIM)*	Total Cu, Zn (200.8)	Ammonia as N (360.1)	Field pH	Field TRC
-1	CS-001	7.2.25	900	G	WW	3	3	0	4	X	X		X	X	X	X	X	X	6.7	0.0
-2	Aquip-INF	7.2.25	910	G	WW	3	2	0	3	X					X	X	X	X	6.8	0.01
Relinquished by: <u>K. Gaudet</u>				Received by: <u>[Signature]</u>				Date: <u>7.2.25</u> Time: <u>1020</u> Temp °C: <u>0.4</u>				<input checked="" type="checkbox"/> EDD format: <u>EQUIS EZEDD</u>								
								Date: <u>7/2/25</u> Time: <u>1630</u> Temp °C: <u>0.2</u>				<input checked="" type="checkbox"/> E-mail to: <u>thenderson@rouxinc.com, sbarrientos@rouxinc.com</u>								
								Condition upon receipt:				<input type="checkbox"/> Present <input type="checkbox"/> Intact <input type="checkbox"/> Broken								
								<input type="checkbox"/> Ambient <input checked="" type="checkbox"/> Refrigerated <input type="checkbox"/> DI VOA Frozen <input type="checkbox"/> Soil Jar Frozen												



620-27304 COC

Phone: 413-789-9018 Fax: 413-506-3830

Chain of Custody Record



Environment Testing

[illegible]

Login Sample Receipt Checklist

Client: Roux Associates Inc

Job Number: 620-27304-1

Login Number: 27304

List Source: Eurofins Rhode Island

List Number: 1

Creator: Scott, Krishnan F

Question	Answer	Comment
Radioactivity wasn't checked or is \leq background as measured by a survey meter.	N/A	
The cooler's custody seal, if present, is intact.	N/A	
Sample custody seals, if present, are intact.	N/A	
The cooler or samples do not appear to have been compromised or tampered with.	True	
Samples were received on ice.	True	
Cooler Temperature is acceptable.	True	
Cooler Temperature is recorded.	True	
COC is present.	True	
COC is filled out in ink and legible.	True	
COC is filled out with all pertinent information.	True	
Is the Field Sampler's name present on COC?	True	
There are no discrepancies between the containers received and the COC.	True	
Samples are received within Holding Time (excluding tests with immediate HTs)	True	
Sample containers have legible labels.	True	
Containers are not broken or leaking.	True	
Sample collection date/times are provided.	True	
Appropriate sample containers are used.	True	
Sample bottles are completely filled.	True	
Sample Preservation Verified.	True	
There is sufficient vol. for all requested analyses, incl. any requested MS/MSDs	True	
Containers requiring zero headspace have no headspace or bubble is $<6\text{mm}$ (1/4").	True	
Multiphasic samples are not present.	True	
Samples do not require splitting or compositing.	True	
Residual Chlorine Checked.	N/A	

Login Sample Receipt Checklist

Client: Roux Associates Inc

Job Number: 620-27304-1

Login Number: 27304

List Source: Eurofins Lancaster Laboratories Environment Testing, LLC

List Number: 2

List Creation: 07/03/25 08:16 AM

Creator: Arroyo, Haley

Question	Answer	Comment
The cooler's custody seal is intact.	N/A	Not present
The cooler or samples do not appear to have been compromised or tampered with.	True	
Samples were received on ice.	True	
Cooler Temperature acceptable, where thermal pres is required ($\leq 6^{\circ}\text{C}$, not frozen).	True	
Cooler Temperature is recorded.	True	
WV: Container Temp acceptable, where thermal pres is required ($\leq 6^{\circ}\text{C}$, not frozen).	N/A	
WV: Container Temperature is recorded.	N/A	
COC is present.	True	
COC is filled out in ink and legible.	True	
COC is filled out with all pertinent information.	True	
There are no discrepancies between the containers received and the COC.	True	
Sample containers have legible labels.	True	
Containers are not broken or leaking.	True	
Sample collection date/times are provided.	True	
Appropriate sample containers are used.	True	
Sample bottles are completely filled.	True	
There is sufficient vol. for all requested analyses.	True	
Is the Field Sampler's name present on COC?	False	Received project as a subcontract.
Sample custody seals are intact.	N/A	Not present.
VOA sample vials do not have headspace $> 6\text{mm}$ in diameter (none, if from WV)?	N/A	

EXHIBIT R

ANALYTICAL REPORT

PREPARED FOR

Attn: Tom Henderson
Roux Associates Inc
200 Summit Drive
Suite 500
Burlington, Massachusetts 01803

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JOB DESCRIPTION

Chelsea Sandwich, LLC - Chelsea, MA

JOB NUMBER

620-28231-1

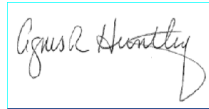
Eurofins Rhode Island

Job Notes

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The test results in this report relate only to the samples as received by the laboratory and will meet all requirements of the methodology, with any exceptions noted. This report shall not be reproduced except in full, without the express written approval of the laboratory. All questions should be directed to the Eurofins Environment Testing Northeast, LLC Project Manager.

Authorization



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Authorized for release by
Agnes Huntley, Project Manager
Agnes.Huntley@et.eurofinsus.com
(401)267-4374

Client: Roux Associates Inc
 Project/Site: Chelsea Sandwich, LLC - Chelsea, MA

Laboratory Job ID: 620-28231-1

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Definitions/Glossary

Client: Roux Associates Inc
 Project/Site: Chelsea Sandwich, LLC - Chelsea, MA

Job ID: 620-28231-1

Qualifiers**GC/MS Semi VOA**

Qualifier	Qualifier Description
*+	LCS and/or LCSD is outside acceptance limits, high biased.
S1-	Surrogate recovery exceeds control limits, low biased.

Glossary

Abbreviation	These commonly used abbreviations may or may not be present in this report.
☼	Listed under the "D" column to designate that the result is reported on a dry weight basis
%R	Percent Recovery
CFL	Contains Free Liquid
CFU	Colony Forming Unit
CNF	Contains No Free Liquid
DER	Duplicate Error Ratio (normalized absolute difference)
Dil Fac	Dilution Factor
DL	Detection Limit (DoD/DOE)
DL, RA, RE, IN	Indicates a Dilution, Re-analysis, Re-extraction, or additional Initial metals/anion analysis of the sample
DLC	Decision Level Concentration (Radiochemistry)
EDL	Estimated Detection Limit (Dioxin)
LOD	Limit of Detection (DoD/DOE)
LOQ	Limit of Quantitation (DoD/DOE)
MCL	EPA recommended "Maximum Contaminant Level"
MDA	Minimum Detectable Activity (Radiochemistry)
MDC	Minimum Detectable Concentration (Radiochemistry)
MDL	Method Detection Limit
ML	Minimum Level (Dioxin)
MPN	Most Probable Number
MQL	Method Quantitation Limit
NC	Not Calculated
ND	Not Detected at the reporting limit (or MDL or EDL if shown)
NEG	Negative / Absent
POS	Positive / Present
PQL	Practical Quantitation Limit
PRES	Presumptive
QC	Quality Control
RER	Relative Error Ratio (Radiochemistry)
RL	Reporting Limit or Requested Limit (Radiochemistry)
RPD	Relative Percent Difference, a measure of the relative difference between two points
TEF	Toxicity Equivalent Factor (Dioxin)
TEQ	Toxicity Equivalent Quotient (Dioxin)
TNTC	Too Numerous To Count

Case Narrative

Client: Roux Associates Inc
 Project: Chelsea Sandwich, LLC - Chelsea, MA

Job ID: 620-28231-1

Job ID: 620-28231-1**Eurofins Rhode Island**

Job Narrative
620-28231-1

The analytical test results presented in this report meet all requirements of the associated regulatory program listed on the Accreditation/Certification Summary Page, unless otherwise noted. Data qualifiers and/or narrative comments are included to explain any exceptions, if applicable. Regulated compliance samples (e.g. SDWA, NPDES) must comply with associated agency requirements/permits.

- Matrix-specific batch QC (e.g., MS, MSD, SD) may not be reported when insufficient sample volume is available or when site-specific QC samples are not submitted. In such cases, a Laboratory Control Sample Duplicate (LCSD) may be analyzed to provide precision data for the batch.
- For samples analyzed using surrogate and/or isotope dilution analytes, any recoveries falling outside of established acceptance criteria are re-prepared and/or re-analyzed to confirm results, unless the deviation is due to sample dilution or otherwise explained in the case narrative.

Receipt

The samples were received on 8/4/2025 3:40 PM. Unless otherwise noted below, the samples arrived in good condition, and, where required, properly preserved and on ice. The temperature of the cooler at receipt time was 3.6°C.

GC/MS VOA

Method 624.1_PREC: Insufficient sample volume was available to perform a matrix spike/matrix spike duplicate (MS/MSD) associated with analytical batch 620-51567.

No additional analytical or quality issues were noted, other than those described above or in the Definitions/ Glossary page.

GC/MS Semi VOA

Method 625.1_PREC: The laboratory control sample (LCS) for preparation batch 620-51601 and analytical batch 620-51557 recovered outside control limits (bias high) for the following analyte: Di-n-butyl phthalate. The affected target analyte recovered within acceptance limits in the laboratory control sample duplicate (LCSD). Per the 625.1 method, analysis may continue.

Method 625.1_PREC: Six surrogates are used for this analysis. The laboratory's SOP allows one acid and one base of these surrogates to be outside acceptance criteria without performing re-extraction/re-analysis. The following sample contained an allowable number of surrogate compounds outside limits: CS-001 (620-28231-2). These results have been reported and qualified.

No additional analytical or quality issues were noted, other than those described above or in the Definitions/ Glossary page.

Metals

No additional analytical or quality issues were noted, other than those described above or in the Definitions/ Glossary page.

General Chemistry

No additional analytical or quality issues were noted, other than those described above or in the Definitions/ Glossary page.

Eurofins Rhode Island

Detection Summary

Client: Roux Associates Inc

Job ID: 620-28231-1

Project/Site: Chelsea Sandwich, LLC - Chelsea, MA

Client Sample ID: AQUIP-INF**Lab Sample ID: 620-28231-1**

Analyte	Result	Qualifier	RL	Unit	Dil Fac	D	Method	Prep Type
Copper	5.94		4.00	ug/L	1		200.8	Total/NA
Zinc	27.1		16.0	ug/L	1		200.8	Total/NA
Ammonia as N	0.315		0.100	mg/L	1		EPA 350.1	Total/NA

Client Sample ID: CS-001**Lab Sample ID: 620-28231-2**

Analyte	Result	Qualifier	RL	Unit	Dil Fac	D	Method	Prep Type
Zinc	80.4		16.0	ug/L	1		200.8	Total/NA
Turbidity	1.9		0.30	NTU	1		180.1	Total/NA

This Detection Summary does not include radiochemical test results.

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Client Sample Results

Client: Roux Associates Inc
Project/Site: Chelsea Sandwich, LLC - Chelsea, MA

Job ID: 620-28231-1

Client Sample ID: Aquip-INF

Lab Sample ID: 620-28231-1

Date Collected: 08/04/25 09:50

Matrix: Water

Date Received: 08/04/25 15:40

Method: EPA 624.1 - Volatile Organic Compounds (GC/MS)

Analyte	Result	Qualifier	RL	Unit	D	Prepared	Analyzed	Dil Fac
Benzene	ND		1.00	ug/L			08/05/25 16:59	1
Surrogate	%Recovery	Qualifier	Limits			Prepared	Analyzed	Dil Fac
4-Bromofluorobenzene (Surr)	96		70 - 130				08/05/25 16:59	1
Toluene-d8 (Surr)	102		70 - 130				08/05/25 16:59	1
1,2-Dichloroethane-d4 (Surr)	90		70 - 130				08/05/25 16:59	1
Dibromofluoromethane (Surr)	80		70 - 130				08/05/25 16:59	1

Method: EPA 625.1 SIM - Semivolatile Organic Compounds GC/MS (SIM)

Analyte	Result	Qualifier	RL	Unit	D	Prepared	Analyzed	Dil Fac
Benzo[a]anthracene	ND		0.0500	ug/L		08/05/25 12:58	08/05/25 18:30	1
Benzo[a]pyrene	ND		0.0500	ug/L		08/05/25 12:58	08/05/25 18:30	1
Benzo[b]fluoranthene	ND		0.0500	ug/L		08/05/25 12:58	08/05/25 18:30	1
Benzo[k]fluoranthene	ND		0.0500	ug/L		08/05/25 12:58	08/05/25 18:30	1
Chrysene	ND		0.0500	ug/L		08/05/25 12:58	08/05/25 18:30	1
Dibenz(a,h)anthracene	ND		0.0500	ug/L		08/05/25 12:58	08/05/25 18:30	1
Indeno[1,2,3-cd]pyrene	ND		0.0500	ug/L		08/05/25 12:58	08/05/25 18:30	1
Naphthalene	ND		0.0500	ug/L		08/05/25 12:58	08/05/25 18:30	1
Surrogate	%Recovery	Qualifier	Limits			Prepared	Analyzed	Dil Fac
2-Fluorobiphenyl (Surr)	35		30 - 130			08/05/25 12:58	08/05/25 18:30	1
Terphenyl-d14	55		30 - 130			08/05/25 12:58	08/05/25 18:30	1
Benzo(e)pyrene-d12	90		30 - 130			08/05/25 12:58	08/05/25 18:30	1

Method: EPA 200.8 - Metals (ICP/MS)

Analyte	Result	Qualifier	RL	Unit	D	Prepared	Analyzed	Dil Fac
Copper	5.94		4.00	ug/L		08/04/25 17:23	08/05/25 15:09	1
Zinc	27.1		16.0	ug/L		08/04/25 17:23	08/05/25 15:09	1

General Chemistry

Analyte	Result	Qualifier	RL	Unit	D	Prepared	Analyzed	Dil Fac
Ammonia as N (EPA 350.1)	0.315		0.100	mg/L			08/06/25 11:07	1
Total Suspended Solids (SM 2540D)	ND		10.0	mg/L			08/05/25 08:36	1

Eurofins Rhode Island

Client Sample Results

Client: Roux Associates Inc
Project/Site: Chelsea Sandwich, LLC - Chelsea, MA

Job ID: 620-28231-1

Client Sample ID: CS-001

Lab Sample ID: 620-28231-2

Date Collected: 08/04/25 09:45

Matrix: Water

Date Received: 08/04/25 15:40

Method: EPA 624.1 - Volatile Organic Compounds (GC/MS)

Analyte	Result	Qualifier	RL	Unit	D	Prepared	Analyzed	Dil Fac
Benzene	ND		1.00	ug/L			08/05/25 17:27	1
Surrogate	%Recovery	Qualifier	Limits			Prepared	Analyzed	Dil Fac
4-Bromofluorobenzene (Surr)	96		70 - 130				08/05/25 17:27	1
Toluene-d8 (Surr)	100		70 - 130				08/05/25 17:27	1
1,2-Dichloroethane-d4 (Surr)	84		70 - 130				08/05/25 17:27	1
Dibromofluoromethane (Surr)	82		70 - 130				08/05/25 17:27	1

Method: EPA 625.1 SIM - Semivolatile Organic Compounds GC/MS (SIM)

Analyte	Result	Qualifier	RL	Unit	D	Prepared	Analyzed	Dil Fac
Benzo[a]anthracene	ND		0.0463	ug/L		08/05/25 12:58	08/05/25 18:58	1
Benzo[a]pyrene	ND		0.0463	ug/L		08/05/25 12:58	08/05/25 18:58	1
Benzo[b]fluoranthene	ND		0.0463	ug/L		08/05/25 12:58	08/05/25 18:58	1
Benzo[k]fluoranthene	ND		0.0463	ug/L		08/05/25 12:58	08/05/25 18:58	1
Chrysene	ND		0.0463	ug/L		08/05/25 12:58	08/05/25 18:58	1
Dibenz(a,h)anthracene	ND		0.0463	ug/L		08/05/25 12:58	08/05/25 18:58	1
Indeno[1,2,3-cd]pyrene	ND		0.0463	ug/L		08/05/25 12:58	08/05/25 18:58	1
Naphthalene	ND		0.0463	ug/L		08/05/25 12:58	08/05/25 18:58	1
Surrogate	%Recovery	Qualifier	Limits			Prepared	Analyzed	Dil Fac
2-Fluorobiphenyl (Surr)	44		30 - 130			08/05/25 12:58	08/05/25 18:58	1
Terphenyl-d14	50		30 - 130			08/05/25 12:58	08/05/25 18:58	1
Benzo(e)pyrene-d12	82		30 - 130			08/05/25 12:58	08/05/25 18:58	1

Method: EPA 625.1 - Semivolatile Organic Compounds (GC/MS)

Analyte	Result	Qualifier	RL	Unit	D	Prepared	Analyzed	Dil Fac
Bis(2-ethylhexyl) phthalate	ND		9.26	ug/L		08/05/25 12:58	08/06/25 13:39	1
Butyl benzyl phthalate	ND		4.63	ug/L		08/05/25 12:58	08/06/25 13:39	1
Diethyl phthalate	ND		4.63	ug/L		08/05/25 12:58	08/06/25 13:39	1
Dimethyl phthalate	ND		4.63	ug/L		08/05/25 12:58	08/06/25 13:39	1
Di-n-butyl phthalate	ND	+	18.5	ug/L		08/05/25 12:58	08/06/25 13:39	1
Di-n-octyl phthalate	ND		4.63	ug/L		08/05/25 12:58	08/06/25 13:39	1
Surrogate	%Recovery	Qualifier	Limits			Prepared	Analyzed	Dil Fac
2-Fluorobiphenyl (Surr)	56		30 - 130			08/05/25 12:58	08/06/25 13:39	1
2-Fluorophenol (Surr)	15		15 - 110			08/05/25 12:58	08/06/25 13:39	1
Nitrobenzene-d5 (Surr)	57		30 - 130			08/05/25 12:58	08/06/25 13:39	1
Phenol-d5 (Surr)	6	S1-	15 - 110			08/05/25 12:58	08/06/25 13:39	1
2,4,6-Tribromophenol (Surr)	50		15 - 110			08/05/25 12:58	08/06/25 13:39	1
Terphenyl-d14	57		30 - 130			08/05/25 12:58	08/06/25 13:39	1

Method: EPA 200.8 - Metals (ICP/MS)

Analyte	Result	Qualifier	RL	Unit	D	Prepared	Analyzed	Dil Fac
Copper	ND		4.00	ug/L		08/04/25 17:23	08/05/25 15:12	1
Zinc	80.4		16.0	ug/L		08/04/25 17:23	08/05/25 15:12	1

General Chemistry

Analyte	Result	Qualifier	RL	Unit	D	Prepared	Analyzed	Dil Fac
Oil & Grease (1664B)	ND		2.0	mg/L		08/05/25 12:28	08/05/25 14:48	1
Turbidity (EPA 180.1)	1.9		0.30	NTU			08/05/25 14:59	1

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Client Sample Results

Client: Roux Associates Inc
Project/Site: Chelsea Sandwich, LLC - Chelsea, MA

Job ID: 620-28231-1

Client Sample ID: CS-001**Lab Sample ID: 620-28231-2****Date Collected: 08/04/25 09:45****Matrix: Water****Date Received: 08/04/25 15:40****General Chemistry (Continued)**

Analyte	Result	Qualifier	RL	Unit	D	Prepared	Analyzed	Dil Fac
Chemical Oxygen Demand (EPA 410.4)	ND		10.0	mg/L		08/05/25 10:26	08/06/25 10:58	1
Ammonia as N (EPA 350.1)	ND		0.100	mg/L			08/06/25 11:10	1
Total Suspended Solids (SM 2540D)	ND		5.00	mg/L			08/05/25 08:36	1

Surrogate Summary

Client: Roux Associates Inc
 Project/Site: Chelsea Sandwich, LLC - Chelsea, MA

Job ID: 620-28231-1

Method: 624.1 - Volatile Organic Compounds (GC/MS)**Matrix: Water****Prep Type: Total/NA**

Lab Sample ID	Client Sample ID	Percent Surrogate Recovery (Acceptance Limits)			
		BFB (70-130)	TOL (70-130)	DCA (70-130)	DBFM (70-130)
620-28231-1	Aquip-INF	96	102	90	80
620-28231-2	CS-001	96	100	84	82
LCS 620-51567/4	Lab Control Sample	101	102	101	102
LCSD 620-51567/5	Lab Control Sample Dup	102	101	95	99
MB 620-51567/7	Method Blank	99	99	104	105

Surrogate Legend

BFB = 4-Bromofluorobenzene (Surr)

TOL = Toluene-d8 (Surr)

DCA = 1,2-Dichloroethane-d4 (Surr)

DBFM = Dibromofluoromethane (Surr)

Method: 625.1 - Semivolatile Organic Compounds (GC/MS)**Matrix: Water****Prep Type: Total/NA**

Lab Sample ID	Client Sample ID	Percent Surrogate Recovery (Acceptance Limits)					
		FBP (30-130)	2FP (15-110)	NBZ (30-130)	PHL (15-110)	TBP (15-110)	TPHL (30-130)
620-28231-2	CS-001	56	15	57	6 S1-	50	57
LCS 620-51601/2-A	Lab Control Sample	59	40	62	29	86	68
LCSD 620-51601/3-A	Lab Control Sample Dup	45	32	46	24	68	59
MB 620-51601/1-A	Method Blank	49	54	50	42	71	59

Surrogate Legend

FBP = 2-Fluorobiphenyl (Surr)

2FP = 2-Fluorophenol (Surr)

NBZ = Nitrobenzene-d5 (Surr)

PHL = Phenol-d5 (Surr)

TBP = 2,4,6-Tribromophenol (Surr)

TPHL = Terphenyl-d14

Method: 625.1 SIM - Semivolatile Organic Compounds GC/MS (SIM)**Matrix: Water****Prep Type: Total/NA**

Lab Sample ID	Client Sample ID	Percent Surrogate Recovery (Acceptance Limits)		
		FBP (30-130)	TPHL (30-130)	BePd12 (30-130)
620-28231-1	Aquip-INF	35	55	90
620-28231-2	CS-001	44	50	82
LCS 620-51601/4-A	Lab Control Sample	44	56	91
MB 620-51601/1-A	Method Blank	39	55	81

Surrogate Legend

FBP = 2-Fluorobiphenyl (Surr)

TPHL = Terphenyl-d14

BePd12 = Benzo(e)pyrene-d12

QC Sample Results

Client: Roux Associates Inc
Project/Site: Chelsea Sandwich, LLC - Chelsea, MA

Job ID: 620-28231-1

Method: 624.1 - Volatile Organic Compounds (GC/MS)

Lab Sample ID: MB 620-51567/7

Matrix: Water

Analysis Batch: 51567

Client Sample ID: Method Blank

Prep Type: Total/NA

Analyte	MB Result	MB Qualifier	RL	Unit	D	Prepared	Analyzed	Dil Fac
Benzene	ND		1.00	ug/L			08/05/25 11:39	1
Surrogate	MB %Recovery	MB Qualifier	Limits			Prepared	Analyzed	Dil Fac
4-Bromofluorobenzene (Surr)	99		70 - 130				08/05/25 11:39	1
Toluene-d8 (Surr)	99		70 - 130				08/05/25 11:39	1
1,2-Dichloroethane-d4 (Surr)	104		70 - 130				08/05/25 11:39	1
Dibromofluoromethane (Surr)	105		70 - 130				08/05/25 11:39	1

Lab Sample ID: LCS 620-51567/4

Matrix: Water

Analysis Batch: 51567

Client Sample ID: Lab Control Sample

Prep Type: Total/NA

Analyte	Spike Added	LCS Result	LCS Qualifier	Unit	D	%Rec	%Rec Limits
Benzene	20.0	18.19		ug/L		91	65 - 135
Surrogate	LCS %Recovery	LCS Qualifier	Limits				
4-Bromofluorobenzene (Surr)	101		70 - 130				
Toluene-d8 (Surr)	102		70 - 130				
1,2-Dichloroethane-d4 (Surr)	101		70 - 130				
Dibromofluoromethane (Surr)	102		70 - 130				

Lab Sample ID: LCSD 620-51567/5

Matrix: Water

Analysis Batch: 51567

Client Sample ID: Lab Control Sample Dup

Prep Type: Total/NA

Analyte	Spike Added	LCSD Result	LCSD Qualifier	Unit	D	%Rec	%Rec Limits	RPD	RPD Limit
Benzene	20.0	17.88		ug/L		89	65 - 135	2	
Surrogate	LCSD %Recovery	LCSD Qualifier	Limits						
4-Bromofluorobenzene (Surr)	102		70 - 130						
Toluene-d8 (Surr)	101		70 - 130						
1,2-Dichloroethane-d4 (Surr)	95		70 - 130						
Dibromofluoromethane (Surr)	99		70 - 130						

Method: 625.1 - Semivolatile Organic Compounds (GC/MS)

Lab Sample ID: MB 620-51601/1-A

Matrix: Water

Analysis Batch: 51557

Client Sample ID: Method Blank

Prep Type: Total/NA

Prep Batch: 51601

Analyte	MB Result	MB Qualifier	RL	Unit	D	Prepared	Analyzed	Dil Fac
Bis(2-ethylhexyl) phthalate	ND		10.0	ug/L		08/05/25 12:58	08/05/25 17:41	1
Butyl benzyl phthalate	ND		5.00	ug/L		08/05/25 12:58	08/05/25 17:41	1
Diethyl phthalate	ND		5.00	ug/L		08/05/25 12:58	08/05/25 17:41	1
Dimethyl phthalate	ND		5.00	ug/L		08/05/25 12:58	08/05/25 17:41	1
Di-n-butyl phthalate	ND		20.0	ug/L		08/05/25 12:58	08/05/25 17:41	1
Di-n-octyl phthalate	ND		5.00	ug/L		08/05/25 12:58	08/05/25 17:41	1

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QC Sample Results

Client: Roux Associates Inc
Project/Site: Chelsea Sandwich, LLC - Chelsea, MA

Job ID: 620-28231-1

Method: 625.1 - Semivolatile Organic Compounds (GC/MS) (Continued)

Lab Sample ID: MB 620-51601/1-A

Matrix: Water

Analysis Batch: 51557

Client Sample ID: Method Blank

Prep Type: Total/NA

Prep Batch: 51601

Surrogate	MB %Recovery	MB Qualifier	Limits	Prepared	Analyzed	Dil Fac
2-Fluorobiphenyl (Surr)	49		30 - 130	08/05/25 12:58	08/05/25 17:41	1
2-Fluorophenol (Surr)	54		15 - 110	08/05/25 12:58	08/05/25 17:41	1
Nitrobenzene-d5 (Surr)	50		30 - 130	08/05/25 12:58	08/05/25 17:41	1
Phenol-d5 (Surr)	42		15 - 110	08/05/25 12:58	08/05/25 17:41	1
2,4,6-Tribromophenol (Surr)	71		15 - 110	08/05/25 12:58	08/05/25 17:41	1
Terphenyl-d14	59		30 - 130	08/05/25 12:58	08/05/25 17:41	1

Lab Sample ID: LCS 620-51601/2-A

Matrix: Water

Analysis Batch: 51557

Client Sample ID: Lab Control Sample

Prep Type: Total/NA

Prep Batch: 51601

Analyte	Spike Added	LCS Result	LCS Qualifier	Unit	D	%Rec	%Rec Limits
Bis(2-ethylhexyl) phthalate	40.0	33.17		ug/L		83	8 - 158
Butyl benzyl phthalate	40.0	33.78		ug/L		84	1 - 152
Diethyl phthalate	40.0	30.50		ug/L		76	1 - 120
Dimethyl phthalate	40.0	29.52		ug/L		74	1 - 120
Di-n-butyl phthalate	40.0	51.93	*+	ug/L		130	1 - 120
Di-n-octyl phthalate	40.0	29.30		ug/L		73	4 - 146

Surrogate	LCS %Recovery	LCS Qualifier	Limits
2-Fluorobiphenyl (Surr)	59		30 - 130
2-Fluorophenol (Surr)	40		15 - 110
Nitrobenzene-d5 (Surr)	62		30 - 130
Phenol-d5 (Surr)	29		15 - 110
2,4,6-Tribromophenol (Surr)	86		15 - 110
Terphenyl-d14	68		30 - 130

Lab Sample ID: LCSD 620-51601/3-A

Matrix: Water

Analysis Batch: 51557

Client Sample ID: Lab Control Sample Dup

Prep Type: Total/NA

Prep Batch: 51601

Analyte	Spike Added	LCSD Result	LCSD Qualifier	Unit	D	%Rec	%Rec Limits	RPD	RPD Limit
Bis(2-ethylhexyl) phthalate	40.0	29.95		ug/L		75	8 - 158	10	82
Butyl benzyl phthalate	40.0	31.74		ug/L		79	1 - 152	6	60
Diethyl phthalate	40.0	26.61		ug/L		67	1 - 120	14	100
Dimethyl phthalate	40.0	25.30		ug/L		63	1 - 120	15	183
Di-n-butyl phthalate	40.0	36.31		ug/L		91	1 - 120	35	47
Di-n-octyl phthalate	40.0	27.61		ug/L		69	4 - 146	6	69

Surrogate	LCSD %Recovery	LCSD Qualifier	Limits
2-Fluorobiphenyl (Surr)	45		30 - 130
2-Fluorophenol (Surr)	32		15 - 110
Nitrobenzene-d5 (Surr)	46		30 - 130
Phenol-d5 (Surr)	24		15 - 110
2,4,6-Tribromophenol (Surr)	68		15 - 110
Terphenyl-d14	59		30 - 130

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QC Sample Results

Client: Roux Associates Inc
Project/Site: Chelsea Sandwich, LLC - Chelsea, MA

Job ID: 620-28231-1

Method: 625.1 SIM - Semivolatile Organic Compounds GC/MS (SIM)

Lab Sample ID: MB 620-51601/1-A

Matrix: Water

Analysis Batch: 51591

Client Sample ID: Method Blank

Prep Type: Total/NA

Prep Batch: 51601

Analyte	MB Result	MB Qualifier	RL	Unit	D	Prepared	Analyzed	Dil Fac
Benzo[a]anthracene	ND		0.0500	ug/L		08/05/25 12:58	08/05/25 17:07	1
Benzo[a]pyrene	ND		0.0500	ug/L		08/05/25 12:58	08/05/25 17:07	1
Benzo[b]fluoranthene	ND		0.0500	ug/L		08/05/25 12:58	08/05/25 17:07	1
Benzo[k]fluoranthene	ND		0.0500	ug/L		08/05/25 12:58	08/05/25 17:07	1
Chrysene	ND		0.0500	ug/L		08/05/25 12:58	08/05/25 17:07	1
Dibenz(a,h)anthracene	ND		0.0500	ug/L		08/05/25 12:58	08/05/25 17:07	1
Indeno[1,2,3-cd]pyrene	ND		0.0500	ug/L		08/05/25 12:58	08/05/25 17:07	1
Naphthalene	ND		0.0500	ug/L		08/05/25 12:58	08/05/25 17:07	1

Surrogate	MB %Recovery	MB Qualifier	Limits	Prepared	Analyzed	Dil Fac
2-Fluorobiphenyl (Surr)	39		30 - 130	08/05/25 12:58	08/05/25 17:07	1
Terphenyl-d14	55		30 - 130	08/05/25 12:58	08/05/25 17:07	1
Benzo(e)pyrene-d12	81		30 - 130	08/05/25 12:58	08/05/25 17:07	1

Lab Sample ID: LCS 620-51601/4-A

Matrix: Water

Analysis Batch: 51591

Client Sample ID: Lab Control Sample

Prep Type: Total/NA

Prep Batch: 51601

Analyte	Spike Added	LCS Result	LCS Qualifier	Unit	D	%Rec	%Rec Limits
Benzo[a]anthracene	4.00	3.747		ug/L		94	33 - 143
Benzo[a]pyrene	4.00	3.653		ug/L		91	17 - 163
Benzo[b]fluoranthene	4.00	2.862		ug/L		72	24 - 159
Benzo[k]fluoranthene	4.00	3.280		ug/L		82	11 - 162
Chrysene	4.00	3.148		ug/L		79	17 - 168
Dibenz(a,h)anthracene	4.00	2.385		ug/L		60	10 - 227
Indeno[1,2,3-cd]pyrene	4.00	2.815		ug/L		70	10 - 171
Naphthalene	4.00	1.875		ug/L		47	21 - 133

Surrogate	LCS %Recovery	LCS Qualifier	Limits
2-Fluorobiphenyl (Surr)	44		30 - 130
Terphenyl-d14	56		30 - 130
Benzo(e)pyrene-d12	91		30 - 130

Method: 200.8 - Metals (ICP/MS)

Lab Sample ID: MB 620-51542/1-A

Matrix: Water

Analysis Batch: 51612

Client Sample ID: Method Blank

Prep Type: Total/NA

Prep Batch: 51542

Analyte	MB Result	MB Qualifier	RL	Unit	D	Prepared	Analyzed	Dil Fac
Copper	ND		4.00	ug/L		08/04/25 17:23	08/05/25 14:58	1
Zinc	ND		16.0	ug/L		08/04/25 17:23	08/05/25 14:58	1

Eurofins Rhode Island

QC Sample Results

Client: Roux Associates Inc
Project/Site: Chelsea Sandwich, LLC - Chelsea, MA

Job ID: 620-28231-1

Method: 200.8 - Metals (ICP/MS) (Continued)

Lab Sample ID: LCS 620-51542/2-A

Matrix: Water

Analysis Batch: 51612

Client Sample ID: Lab Control Sample

Prep Type: Total/NA

Prep Batch: 51542

Analyte	Spike Added	LCS Result	LCS Qualifier	Unit	D	%Rec	%Rec Limits
Copper	50.0	44.07		ug/L		88	85 - 115
Zinc	50.0	36.20		ug/L		72	85 - 115

Method: 1664B - HEM and SGT-HEM

Lab Sample ID: MB 620-51596/1-A

Matrix: Water

Analysis Batch: 51613

Client Sample ID: Method Blank

Prep Type: Total/NA

Prep Batch: 51596

Analyte	MB Result	MB Qualifier	RL	Unit	D	Prepared	Analyzed	Dil Fac
Oil & Grease	ND		2.0	mg/L		08/05/25 12:28	08/05/25 14:48	1

Lab Sample ID: LCS 620-51596/2-A

Matrix: Water

Analysis Batch: 51613

Client Sample ID: Lab Control Sample

Prep Type: Total/NA

Prep Batch: 51596

Analyte	Spike Added	LCS Result	LCS Qualifier	Unit	D	%Rec	%Rec Limits
Oil & Grease	40.0	32.60		mg/L		82	78 - 114

Lab Sample ID: LCSD 620-51596/3-A

Matrix: Water

Analysis Batch: 51613

Client Sample ID: Lab Control Sample Dup

Prep Type: Total/NA

Prep Batch: 51596

Analyte	Spike Added	LCSD Result	LCSD Qualifier	Unit	D	%Rec	%Rec Limits	RPD	RPD Limit
Oil & Grease	40.0	34.30		mg/L		86	78 - 114	5	11

Method: 180.1 - Turbidity, Nephelometric

Lab Sample ID: MB 620-51618/8

Matrix: Water

Analysis Batch: 51618

Client Sample ID: Method Blank

Prep Type: Total/NA

Analyte	MB Result	MB Qualifier	RL	Unit	D	Prepared	Analyzed	Dil Fac
Turbidity	ND		0.30	NTU			08/05/25 14:59	1

Lab Sample ID: LCS 620-51618/9

Matrix: Water

Analysis Batch: 51618

Client Sample ID: Lab Control Sample

Prep Type: Total/NA

Analyte	Spike Added	LCS Result	LCS Qualifier	Unit	D	%Rec	%Rec Limits
Turbidity	102	100		NTU		100	90 - 110

Method: 410.4 - COD

Lab Sample ID: MB 620-51581/3-A

Matrix: Water

Analysis Batch: 51670

Client Sample ID: Method Blank

Prep Type: Total/NA

Prep Batch: 51581

Analyte	MB Result	MB Qualifier	RL	Unit	D	Prepared	Analyzed	Dil Fac
Chemical Oxygen Demand	ND		10.0	mg/L		08/05/25 10:26	08/06/25 10:58	1

Eurofins Rhode Island

QC Sample Results

Client: Roux Associates Inc
Project/Site: Chelsea Sandwich, LLC - Chelsea, MA

Job ID: 620-28231-1

Method: 410.4 - COD (Continued)

Lab Sample ID: LCS 620-51581/4-A

Matrix: Water

Analysis Batch: 51670

Client Sample ID: Lab Control Sample

Prep Type: Total/NA

Prep Batch: 51581

Analyte	Spike Added	LCS Result	LCS Qualifier	Unit	D	%Rec	%Rec Limits
Chemical Oxygen Demand	75.0	76.44		mg/L		102	90 - 110

Lab Sample ID: 620-28231-2 MS

Matrix: Water

Analysis Batch: 51670

Client Sample ID: CS-001

Prep Type: Total/NA

Prep Batch: 51581

Analyte	Sample Result	Sample Qualifier	Spike Added	MS Result	MS Qualifier	Unit	D	%Rec	%Rec Limits
Chemical Oxygen Demand	ND		75.0	72.65		mg/L		97	80 - 120

Lab Sample ID: 620-28231-2 DU

Matrix: Water

Analysis Batch: 51670

Client Sample ID: CS-001

Prep Type: Total/NA

Prep Batch: 51581

Analyte	Sample Result	Sample Qualifier	DU Result	DU Qualifier	Unit	D	RPD	RPD Limit
Chemical Oxygen Demand	ND		ND		mg/L		NC	20

Method: EPA 350.1 - Nitrogen, Ammonia

Lab Sample ID: MB 410-681656/53

Matrix: Water

Analysis Batch: 681656

Client Sample ID: Method Blank

Prep Type: Total/NA

Analyte	MB Result	MB Qualifier	RL	Unit	D	Prepared	Analyzed	Dil Fac
Ammonia as N	ND		0.100	mg/L			08/06/25 10:45	1

Lab Sample ID: LCS 410-681656/51

Matrix: Water

Analysis Batch: 681656

Client Sample ID: Lab Control Sample

Prep Type: Total/NA

Analyte	Spike Added	LCS Result	LCS Qualifier	Unit	D	%Rec	%Rec Limits
Ammonia as N	2.00	1.934		mg/L		97	90 - 110

Lab Sample ID: LCSD 410-681656/52

Matrix: Water

Analysis Batch: 681656

Client Sample ID: Lab Control Sample Dup

Prep Type: Total/NA

Analyte	Spike Added	LCSD Result	LCSD Qualifier	Unit	D	%Rec	%Rec Limits	RPD	RPD Limit
Ammonia as N	2.00	2.018		mg/L		101	90 - 110	4	15

Method: SM 2540D - Solids, Total Suspended (TSS)

Lab Sample ID: MB 620-51551/1

Matrix: Water

Analysis Batch: 51551

Client Sample ID: Method Blank

Prep Type: Total/NA

Analyte	MB Result	MB Qualifier	RL	Unit	D	Prepared	Analyzed	Dil Fac
Total Suspended Solids	ND		5.00	mg/L			08/05/25 08:36	1

Eurofins Rhode Island

QC Sample Results

Client: Roux Associates Inc
 Project/Site: Chelsea Sandwich, LLC - Chelsea, MA

Job ID: 620-28231-1

Method: SM 2540D - Solids, Total Suspended (TSS) (Continued)**Lab Sample ID: LCS 620-51551/2****Matrix: Water****Analysis Batch: 51551****Client Sample ID: Lab Control Sample****Prep Type: Total/NA**

Analyte	Spike Added	LCS Result	LCS Qualifier	Unit	D	%Rec	%Rec Limits
Total Suspended Solids	100	90.00		mg/L		90	77 - 110

Lab Sample ID: 620-28231-2 DU**Matrix: Water****Analysis Batch: 51551****Client Sample ID: CS-001****Prep Type: Total/NA**

Analyte	Sample Result	Sample Qualifier	DU Result	DU Qualifier	Unit	D	RPD	RPD Limit
Total Suspended Solids	ND		ND		mg/L		NC	5

QC Association Summary

Client: Roux Associates Inc
 Project/Site: Chelsea Sandwich, LLC - Chelsea, MA

Job ID: 620-28231-1

GC/MS VOA**Analysis Batch: 51567**

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
620-28231-1	Aquip-INF	Total/NA	Water	624.1	
620-28231-2	CS-001	Total/NA	Water	624.1	
MB 620-51567/7	Method Blank	Total/NA	Water	624.1	
LCS 620-51567/4	Lab Control Sample	Total/NA	Water	624.1	
LCSD 620-51567/5	Lab Control Sample Dup	Total/NA	Water	624.1	

GC/MS Semi VOA**Analysis Batch: 51557**

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
MB 620-51601/1-A	Method Blank	Total/NA	Water	625.1	51601
LCS 620-51601/2-A	Lab Control Sample	Total/NA	Water	625.1	51601
LCSD 620-51601/3-A	Lab Control Sample Dup	Total/NA	Water	625.1	51601

Analysis Batch: 51591

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
620-28231-1	Aquip-INF	Total/NA	Water	625.1 SIM	51601
620-28231-2	CS-001	Total/NA	Water	625.1 SIM	51601
MB 620-51601/1-A	Method Blank	Total/NA	Water	625.1 SIM	51601
LCS 620-51601/4-A	Lab Control Sample	Total/NA	Water	625.1 SIM	51601

Prep Batch: 51601

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
620-28231-1	Aquip-INF	Total/NA	Water	625	
620-28231-2	CS-001	Total/NA	Water	625	
MB 620-51601/1-A	Method Blank	Total/NA	Water	625	
LCS 620-51601/2-A	Lab Control Sample	Total/NA	Water	625	
LCS 620-51601/4-A	Lab Control Sample	Total/NA	Water	625	
LCSD 620-51601/3-A	Lab Control Sample Dup	Total/NA	Water	625	

Analysis Batch: 51653

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
620-28231-2	CS-001	Total/NA	Water	625.1	51601

Metals**Prep Batch: 51542**

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
620-28231-1	Aquip-INF	Total/NA	Water	200.8	
620-28231-2	CS-001	Total/NA	Water	200.8	
MB 620-51542/1-A	Method Blank	Total/NA	Water	200.8	
LCS 620-51542/2-A	Lab Control Sample	Total/NA	Water	200.8	

Analysis Batch: 51612

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
620-28231-1	Aquip-INF	Total/NA	Water	200.8	51542
620-28231-2	CS-001	Total/NA	Water	200.8	51542
MB 620-51542/1-A	Method Blank	Total/NA	Water	200.8	51542
LCS 620-51542/2-A	Lab Control Sample	Total/NA	Water	200.8	51542

Eurofins Rhode Island

QC Association Summary

Client: Roux Associates Inc
 Project/Site: Chelsea Sandwich, LLC - Chelsea, MA

Job ID: 620-28231-1

General Chemistry**Analysis Batch: 51551**

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
620-28231-1	Aquip-INF	Total/NA	Water	SM 2540D	
620-28231-2	CS-001	Total/NA	Water	SM 2540D	
MB 620-51551/1	Method Blank	Total/NA	Water	SM 2540D	
LCS 620-51551/2	Lab Control Sample	Total/NA	Water	SM 2540D	
620-28231-2 DU	CS-001	Total/NA	Water	SM 2540D	

Prep Batch: 51581

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
620-28231-2	CS-001	Total/NA	Water	410.4	
MB 620-51581/3-A	Method Blank	Total/NA	Water	410.4	
LCS 620-51581/4-A	Lab Control Sample	Total/NA	Water	410.4	
620-28231-2 MS	CS-001	Total/NA	Water	410.4	
620-28231-2 DU	CS-001	Total/NA	Water	410.4	

Prep Batch: 51596

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
620-28231-2	CS-001	Total/NA	Water	1664B	
MB 620-51596/1-A	Method Blank	Total/NA	Water	1664B	
LCS 620-51596/2-A	Lab Control Sample	Total/NA	Water	1664B	
LCSD 620-51596/3-A	Lab Control Sample Dup	Total/NA	Water	1664B	

Analysis Batch: 51613

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
620-28231-2	CS-001	Total/NA	Water	1664B	51596
MB 620-51596/1-A	Method Blank	Total/NA	Water	1664B	51596
LCS 620-51596/2-A	Lab Control Sample	Total/NA	Water	1664B	51596
LCSD 620-51596/3-A	Lab Control Sample Dup	Total/NA	Water	1664B	51596

Analysis Batch: 51618

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
620-28231-2	CS-001	Total/NA	Water	180.1	
MB 620-51618/8	Method Blank	Total/NA	Water	180.1	
LCS 620-51618/9	Lab Control Sample	Total/NA	Water	180.1	

Analysis Batch: 51670

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
620-28231-2	CS-001	Total/NA	Water	410.4	51581
MB 620-51581/3-A	Method Blank	Total/NA	Water	410.4	51581
LCS 620-51581/4-A	Lab Control Sample	Total/NA	Water	410.4	51581
620-28231-2 MS	CS-001	Total/NA	Water	410.4	51581
620-28231-2 DU	CS-001	Total/NA	Water	410.4	51581

Analysis Batch: 681656

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
620-28231-1	Aquip-INF	Total/NA	Water	EPA 350.1	
620-28231-2	CS-001	Total/NA	Water	EPA 350.1	
MB 410-681656/53	Method Blank	Total/NA	Water	EPA 350.1	
LCS 410-681656/51	Lab Control Sample	Total/NA	Water	EPA 350.1	
LCSD 410-681656/52	Lab Control Sample Dup	Total/NA	Water	EPA 350.1	

Eurofins Rhode Island

Lab Chronicle

Client: Roux Associates Inc
 Project/Site: Chelsea Sandwich, LLC - Chelsea, MA

Job ID: 620-28231-1

Client Sample ID: Aquip-INF**Date Collected: 08/04/25 09:50****Date Received: 08/04/25 15:40****Lab Sample ID: 620-28231-1****Matrix: Water**

Prep Type	Batch Type	Batch Method	Run	Dilution Factor	Batch Number	Analyst	Lab	Prepared or Analyzed
Total/NA	Analysis	624.1		1	51567	CLR	EET RI	08/05/25 16:59
Total/NA	Prep	625			51601	JAC	EET RI	08/05/25 12:58
Total/NA	Analysis	625.1 SIM		1	51591	JS	EET RI	08/05/25 18:30
Total/NA	Prep	200.8			51542	SRC	EET RI	08/04/25 17:23
Total/NA	Analysis	200.8		1	51612	JPC	EET RI	08/05/25 15:09
Total/NA	Analysis	EPA 350.1		1	681656	JCG7	ELLE	08/06/25 11:07
Total/NA	Analysis	SM 2540D		1	51551	DJW	EET RI	08/05/25 08:36

Client Sample ID: CS-001**Date Collected: 08/04/25 09:45****Date Received: 08/04/25 15:40****Lab Sample ID: 620-28231-2****Matrix: Water**

Prep Type	Batch Type	Batch Method	Run	Dilution Factor	Batch Number	Analyst	Lab	Prepared or Analyzed
Total/NA	Analysis	624.1		1	51567	CLR	EET RI	08/05/25 17:27
Total/NA	Prep	625			51601	JAC	EET RI	08/05/25 12:58
Total/NA	Analysis	625.1		1	51653	JS	EET RI	08/06/25 13:39
Total/NA	Prep	625			51601	JAC	EET RI	08/05/25 12:58
Total/NA	Analysis	625.1 SIM		1	51591	JS	EET RI	08/05/25 18:58
Total/NA	Prep	200.8			51542	SRC	EET RI	08/04/25 17:23
Total/NA	Analysis	200.8		1	51612	JPC	EET RI	08/05/25 15:12
Total/NA	Prep	1664B			51596	AZD	EET RI	08/05/25 12:28
Total/NA	Analysis	1664B		1	51613	AZD	EET RI	08/05/25 14:48
Total/NA	Analysis	180.1		1	51618	MJH	EET RI	08/05/25 14:59
Total/NA	Prep	410.4			51581	DJW	EET RI	08/05/25 10:26
Total/NA	Analysis	410.4		1	51670	DJW	EET RI	08/06/25 10:58
Total/NA	Analysis	EPA 350.1		1	681656	JCG7	ELLE	08/06/25 11:10
Total/NA	Analysis	SM 2540D		1	51551	DJW	EET RI	08/05/25 08:36

Laboratory References:

EET RI = Eurofins Rhode Island, 646 Camp Ave, North Kingstown, RI 02852, TEL (413)789-9018

ELLE = Eurofins Lancaster Laboratories Environment Testing, LLC, 2425 New Holland Pike, Lancaster, PA 17601, TEL (717)656-2300

Accreditation/Certification Summary

Client: Roux Associates Inc

Job ID: 620-28231-1

Project/Site: Chelsea Sandwich, LLC - Chelsea, MA

Laboratory: Eurofins Rhode Island

Unless otherwise noted, all analytes for this laboratory were covered under each accreditation/certification below.

Authority	Program	Identification Number	Expiration Date
Massachusetts	State	M-RI907	06-30-26

The following analytes are included in this report, but the laboratory is not certified by the governing authority. This list may include analytes for which the agency does not offer certification.

Analysis Method	Prep Method	Matrix	Analyte
180.1		Water	Turbidity
625.1 SIM	625	Water	Benzo[a]anthracene
625.1 SIM	625	Water	Benzo[a]pyrene
625.1 SIM	625	Water	Benzo[b]fluoranthene
625.1 SIM	625	Water	Benzo[k]fluoranthene
625.1 SIM	625	Water	Chrysene
625.1 SIM	625	Water	Dibenz(a,h)anthracene
625.1 SIM	625	Water	Indeno[1,2,3-cd]pyrene
625.1 SIM	625	Water	Naphthalene

Laboratory: Eurofins Lancaster Laboratories Environment Testing, LLC

The accreditations/certifications listed below are applicable to this report.

Authority	Program	Identification Number	Expiration Date
Massachusetts	State	M-PA009	06-30-26

Method Summary

Client: Roux Associates Inc
 Project/Site: Chelsea Sandwich, LLC - Chelsea, MA

Job ID: 620-28231-1

Method	Method Description	Protocol	Laboratory
624.1	Volatile Organic Compounds (GC/MS)	EPA	EET RI
625.1	Semivolatile Organic Compounds (GC/MS)	EPA	EET RI
625.1 SIM	Semivolatile Organic Compounds GC/MS (SIM)	EPA	EET RI
200.8	Metals (ICP/MS)	EPA	EET RI
1664B	HEM and SGT-HEM	1664B	EET RI
180.1	Turbidity, Nephelometric	EPA	EET RI
410.4	COD	EPA	EET RI
EPA 350.1	Nitrogen, Ammonia	EPA	ELLE
SM 2540D	Solids, Total Suspended (TSS)	SM	EET RI
1664B	HEM and SGT-HEM (Aqueous)	1664B	EET RI
200.8	Preparation, Total Metals	EPA	EET RI
410.4	COD	EPA	EET RI
625	Liquid-Liquid Extraction	EPA	EET RI

Protocol References:

1664B = EPA-821-98-002

EPA = US Environmental Protection Agency

SM = "Standard Methods For The Examination Of Water And Wastewater"

Laboratory References:

EET RI = Eurofins Rhode Island, 646 Camp Ave, North Kingstown, RI 02852, TEL (413)789-9018

ELLE = Eurofins Lancaster Laboratories Environment Testing, LLC, 2425 New Holland Pike, Lancaster, PA 17601, TEL (717)656-2300

Sample Summary

Client: Roux Associates Inc
Project/Site: Chelsea Sandwich, LLC - Chelsea, MA

Job ID: 620-28231-1

Lab Sample ID	Client Sample ID	Matrix	Collected	Received	Sample Origin
620-28231-1	Aquip-INF	Water	08/04/25 09:50	08/04/25 15:40	Massachusetts
620-28231-2	CS-001	Water	08/04/25 09:45	08/04/25 15:40	Massachusetts

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15

[illegible]

8/7/2025

Login Sample Receipt Checklist

Client: Roux Associates Inc

Job Number: 620-28231-1

Login Number: 28231

List Source: Eurofins Rhode Island

List Number: 1

Creator: Makhoul, Elie

Question	Answer	Comment
Radioactivity wasn't checked or is \leq background as measured by a survey meter.	N/A	
The cooler's custody seal, if present, is intact.	N/A	
Sample custody seals, if present, are intact.	N/A	
The cooler or samples do not appear to have been compromised or tampered with.	True	
Samples were received on ice.	True	
Cooler Temperature is acceptable.	True	
Cooler Temperature is recorded.	True	
COC is present.	True	
COC is filled out in ink and legible.	True	
COC is filled out with all pertinent information.	True	
Is the Field Sampler's name present on COC?	True	
There are no discrepancies between the containers received and the COC.	True	
Samples are received within Holding Time (excluding tests with immediate HTs)	True	
Sample containers have legible labels.	True	
Containers are not broken or leaking.	True	
Sample collection date/times are provided.	True	
Appropriate sample containers are used.	True	
Sample bottles are completely filled.	True	
Sample Preservation Verified.	True	
There is sufficient vol. for all requested analyses, incl. any requested MS/MSDs	True	
Containers requiring zero headspace have no headspace or bubble is $<6\text{mm}$ (1/4").	True	
Multiphasic samples are not present.	True	
Samples do not require splitting or compositing.	True	
Residual Chlorine Checked.	N/A	

Login Sample Receipt Checklist

Client: Roux Associates Inc

Job Number: 620-28231-1

Login Number: 28231

List Source: Eurofins Lancaster Laboratories Environment Testing, LLC

List Number: 2

List Creation: 08/05/25 05:58 AM

Creator: Renner, Melissa

Question	Answer	Comment
The cooler's custody seal is intact.	True	
The cooler or samples do not appear to have been compromised or tampered with.	True	
Samples were received on ice.	True	
Cooler Temperature acceptable, where thermal pres is required ($\leq 6^{\circ}\text{C}$, not frozen).	True	
Cooler Temperature is recorded.	True	
WV: Container Temp acceptable, where thermal pres is required ($\leq 6^{\circ}\text{C}$, not frozen).	N/A	
WV: Container Temperature is recorded.	N/A	
COC is present.	True	
COC is filled out in ink and legible.	True	
COC is filled out with all pertinent information.	True	
There are no discrepancies between the containers received and the COC.	True	
Sample containers have legible labels.	True	
Containers are not broken or leaking.	True	
Sample collection date/times are provided.	True	
Appropriate sample containers are used.	True	
Sample bottles are completely filled.	True	
There is sufficient vol. for all requested analyses.	True	
Is the Field Sampler's name present on COC?	False	Received project as a subcontract.
Sample custody seals are intact.	N/A	Not present.
VOA sample vials do not have headspace $> 6\text{mm}$ in diameter (none, if from WV)?	N/A	

EXHIBIT S

Table 1. CS-001 Treatment System Start-up Analytical Results
NPDES Permit No. MA0003280
Chelsea Sandwich LLC, Chelsea, MA 02150

DRAFT

Analyte	Week Number			0		1		2		3		4		4 - Reanalysis		5		6		7		8					
	Sample Date			4/22/2025		5/2/2025		5/6/2025		5/13/2025		5/20/2025		5/20/2025		5/28/2025		6/2/2025		6/9/2025		6/16/2025		7/2/2025		8/4/2025	
	Sample ID			AQUIP-INF	CS-001	AQUIP-INF	CS-001	AQUIP-INF	CS-001	AQUIP-INF	CS-001	AQUIP-INF	CS-001	AQUIP-INF	CS-001	AQUIP-INF	CS-001	AQUIP-INF	CS-001	AQUIP-INF	CS-001	AQUIP-INF	CS-001	AQUIP-INF	CS-001	AQUIP-INF	CS-001
	Permit Daily Maximum Limitation	Permit Monthly Average Limitation	Unit																								
Benzene	5	--	µg/L	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	NA	NA	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0
Benzo(a)anthracene	--	0.0013	µg/L	0.0798	< 0.0481	0.0904	< 0.0481	< 0.0463	< 0.0463	< 0.0463	< 0.0463	< 0.0463	< 0.0463	NA	NA	< 0.0481	< 0.0481	< 0.0463	< 0.0472	< 0.0463	< 0.0463	< 0.0446	< 0.0500	< 0.0463	< 0.0463	< 0.05	< 0.0463
Benzo(a)pyrene	--	0.00013	µg/L	< 0.050	< 0.0481	< 0.0481	< 0.0481	< 0.0463	< 0.0463	< 0.0463	< 0.0463	< 0.0463	< 0.0463	NA	NA	< 0.0481	< 0.0481	< 0.0463	< 0.0472	< 0.0463	< 0.0463	< 0.0446	< 0.0500	< 0.0463	< 0.0463	< 0.05	< 0.0463
Benzo(b)fluoranthene	--	0.0013	µg/L	0.0613	< 0.0481	0.0752	< 0.0481	< 0.0463	< 0.0463	< 0.0463	< 0.0463	< 0.0463	< 0.0463	NA	NA	< 0.0481	< 0.0481	< 0.0463	< 0.0472	< 0.0463	< 0.0463	< 0.0446	< 0.0500	< 0.0463	< 0.0463	< 0.05	< 0.0463
Benzo(k)fluoranthene	--	0.013	µg/L	< 0.050	< 0.0481	< 0.0481	< 0.0481	< 0.0463	< 0.0463	< 0.0463	< 0.0463	< 0.0463	< 0.0463	NA	NA	< 0.0481	< 0.0481	< 0.0463	< 0.0472	< 0.0463	< 0.0463	< 0.0446	< 0.0500	< 0.0463	< 0.0463	< 0.05	< 0.0463
Chrysene	--	0.13	µg/L	< 0.050	< 0.0481	< 0.0481	< 0.0481	< 0.0463	< 0.0463	< 0.0463	< 0.0463	< 0.0463	< 0.0463	NA	NA	< 0.0481	< 0.0481	< 0.0463	< 0.0472	< 0.0463	< 0.0463	< 0.0446	< 0.0500	< 0.0463	< 0.0463	< 0.05	< 0.0463
Dibenzo(a,h)anthracene	--	0.00013	µg/L	< 0.050	< 0.0481	< 0.0481	< 0.0481	< 0.0463	< 0.0463	< 0.0463	< 0.0463	< 0.0463	< 0.0463	NA	NA	< 0.0481	< 0.0481	< 0.0463	< 0.0472	< 0.0463	< 0.0463	< 0.0446	< 0.0500	< 0.0463	< 0.0463	< 0.05	< 0.0463
Indeno(1,2,3-cd)pyrene	--	0.0013	µg/L	< 0.050	< 0.0481	< 0.0481	< 0.0481	< 0.0463	< 0.0463	< 0.0463	< 0.0463	< 0.0463	< 0.0463	NA	NA	< 0.0481	< 0.0481	< 0.0463	< 0.0472	< 0.0463	< 0.0463	< 0.0446	< 0.0500	< 0.0463	< 0.0463	< 0.05	< 0.0463
Naphthalene	20	--	µg/L	< 0.050	< 0.0481	NA	< 0.0481	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	< 0.0472	NA	NA	NA	NA	< 0.0463	< 0.0463	< 0.05	< 0.0463
Total Copper	5.8	--	µg/L	10.5	< 4.0	19.2	< 4.0	7.39	< 4.0	8.49	< 4.0	5.4	< 4.0	5.82	< 4.0	7.41 F1	< 4.0	4.95	< 4.0	9.7	< 4.0	5.5	< 4.0	13.3	< 4.0	5.94	< 4.0
Total Zinc	95.1	--	µg/L	80	< 16.0	153	< 16.0	38.1	< 16.0	< 16.0	< 16.0	19.7	19.7	21.1	16.1	50.3 F1	16.8	46.8	16.2	69.9	< 16.0	34.3	30.3	34.8	22.4	27.1	80.4
Total Ammonia as Nitrogen	1.8	--	mg/L	NA	0.308	0.583	0.192	< 0.1	0.143	< 0.1	< 0.1	0.415	0.19	NA	NA	0.142	< 0.1	0.281	0.153	0.251	< 0.1	0.394	0.161	1.02	0.184	0.315	< 0.10
Total Suspended Solids	100	30	mg/L	< 20.0	< 5.0	24.5	< 5.0	< 10.0	< 5.0	< 10.0	5	< 5.0	< 5.0	NA	NA	< 5.0	< 5.0	5.5	< 5.0	5.5	< 5.0	< 10.0	< 5.0	15	< 5.0	< 10.0	< 5.0
Total Residual Chlorine	30	--	µg/L	10	10	20	10	10	0	20	0	20	0	NA	NA	10	0	10	0	10	0	10	0	10	0	20	20
pH	6.5 - 8.5		SU	6.9	7.3	6.7	6.9	7.1	7.5	6.8	6.8	7	6.7	NA	NA	6.7	6.6	6.7	6.7	6.8	6.7	6.8	6.8	6.8	6.7	6.8	7.1
Oil & Grease	15	--	mg/L	< 1.9	< 1.9	NA	< 2.1	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	< 2.0	NA	NA	NA	NA	NA	< 1.9 *-	NA	< 2.0
Turbidity	--	--	NTU	0.45	0.9	NA	15	NA	< 0.3	NA	NA	NA	NA	NA	NA	NA	NA	NA	1.4	NA	1.1	NA	NA	NA	0.4	NA	1.9
Chemical Oxygen Demand	--	--	mg/L	NA	< 10.0	NA	< 10.0	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	< 10.0	NA	NA	NA	NA	NA	< 10.0	NA	< 10.0
Total cyanide	5	--	µg/L	2.0 J	< 1.0	NA	< 1.0	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	2.0 J	NA	NA	NA	NA	NA	< 1.0	NA	< 1.0
Fecal coliform	--	--	MPN/100ml	9.79	2.02	NA	2.02	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	54.75	NA	NA	NA	NA	NA	365.4	NA	50.39
Enterococcus	--	--	MPN/100ml	74.39	42.57	NA	61.98	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	9.6	NA	NA	NA	NA	NA	9.69	NA	81.62

Notes:

F1, indicates that the MS/MSD recovery exceeded control limits

Analytes shaded in yellow indicates a Consent Order required analyte

--, indicates there is no value listed in NPDES Permit #MA0003280

<, indicates analyte not detected above laboratory reporting limit; value shown is laboratory reporting limit.

For the Polycyclic Aromatic Hydrocarbons (PAHs) listed above, the Permit specified minimum level of laboratory analysis is 0.5 ug/L, which is greater than the monthly average Permit limit.

Bold, indicates analyte detected above laboratory reporting limit

Concentration above Permit Daily Maximum Limitation and/or the Permit Monthly Average Limitation

µg/L, micrograms per liter

J, indicates an Estimated value. The Target analyte concentration is below the quantitation limit (RL), but above the Method Detection Limit (MDL)

*- indicates LCS and/or LCSD is outside the acceptance limits, low biased

mg/L, milligrams per liter

MPN, Most probable number of microorganism per 100 milliliters (mL) of sample

NA, indicates the analyte was not analyzed for

NTU, Nephelometric Turbidity Units

SU, Standard units

The sample collected on 5/20/25 was reanalyzed for total copper and total zinc, due to the initial analytical results appearing to indicate that the total zinc sample result was reported twice for the AQUIP-INF and CS-001.

Due to a laboratory error during the analysis of the fecal coliform sample collected on 7/2/25, an additional sample from CS-001 for fecal coliform analysis was collected on 7/10/25

EXHIBIT T

From: Sara Walsh <sara.walsh@globalp.com>
Sent: Monday, June 30, 2025 10:29 AM
To: Rosenberg, Alex; Little, Shauna; King, Susannah (DEP); Coniaris, Catherine (DEP)
Cc: Steve Charron; Tom Keefe; Matthew Snell; Matthew Connolly; Thomas Henderson
Subject: CWA-AO-R01-FY24-46-Global Consent Order Amended SWPPP
Attachments: Chelsea Sandwich LLC - Chelsea Terminal SWPPP 06.30.2025.pdf

All,

As required by paragraph IV.4 of Administrative Order of Consent CWA-AO-R01-FY24-46, Global Companies LLC and Chelsea Sandwich LLC (collectively "Global") submit the attached amended Stormwater Pollution Prevention Plan (SWPPP) for the Chelsea Sandwich Facility reflecting the installation of the Newterra Treatment System.

If you have any questions, please contact Tom Keefe at (781)398-4132.

Sara Walsh
Environmental Compliance Specialist

Cell: 781-382-8710

800 South Street, Suite 500
Waltham, MA 02453

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Putting Our Energy to Work